



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

January 12, 2016

Mr. Brian Dully, Mgr. EH & S
Warren Steel Holdings
4000 Mahoning Ave.
Warren, Ohio 44483

**Re: Warren Steel Holdings
Notice of Violation (NOV)
NOV
RCRA C - Hazardous Waste
Mahoning County
OHR000007773**

Subject: Complaint Investigation and LQG CEI NOV

Dear Mr. Dully:

On August 21 and 26, 2015, Frank Zingales and I visited Warren Steel Holdings (WSH) in Warren to conduct a complaint investigation and to conduct a large quantity hazardous waste generator compliance evaluation inspection. We met primarily with John Scheel and you. Representatives of the Ohio EPA Division of Air Pollution Control and the Youngstown City Health District were also present on August 21, 2015. (Please see the attached narrative for more details of the visits and participants.) We inspected WSH to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). We reviewed available records as well as walked through the facility and observed production processes.

Since our visits you have been in contact with us on several occasions. On September 3, 2015, you called Frank Zingales in my absence and gave him an update on corrective measures taken. On September 16, 2015, you and Mr. Scheel met with me in my office and provided documentation and an additional update on corrective measures. On September 29, 2015, you spoke with me and gave another update on progress being made to abate issues and violations and I received an e-mail update on October 14, 2015 related to the lime waste piles to the west of the Melt Shop. On November 3, 2015, you sent electronic copies of manifests, shipping papers and waste analyses. On November 5, 2015, you submitted a *Stockpile Sampling and Management Plan* for the remaining waste piles and on November 9, 2015, I sent you our comments on this plan. On November 20, 2015, Frank and I met with you and your

consultants at the site to discuss changes and improvements to the sampling plan. On November 25, 2015, you submitted a revised sampling plan and another on December 4, 2015 with some additional changes. On December 4, 2015, we agreed with your proposal to implement the plan.

On December 4, 2015 you notified me that WSH was temporarily shutting down production and you submitted a temporary cessation of regulated operations (CRO) notification. On December 14, 2015 you submitted some of the requested waste determinations.

During our investigation and inspection we found the following violations of Ohio's hazardous waste rules and law.

1. **Unlawful Disposal or Storage Without a Permit – ORC 3734.02(E) & (F)** *No person shall establish or operate a facility to dispose or store hazardous waste without a hazardous waste installation and operation permit (permit). A person who owns or operates a hazardous waste disposal facility or a generator who accumulates hazardous waste for more than ninety days is an owner/operator of a hazardous waste disposal facility and is subject to the hazardous waste general facility requirements found in OAC chapters 3745-54 and 3745-55, including obtaining a hazardous waste installation and operation permit.*

- a.) WSH disposed of electric arc furnace (EAF) dust which is a listed hazardous waste, K061, as described in OAC 3745-51-32, on the ground on the southwest portion of the site. WSH does not hold a permit for such disposal of hazardous waste. We informed you that any hazardous waste on the southwest part of the site should be immediately cleaned up and properly managed. We understand that WSH had Odyssey Environmental Services vacuum up that pile shortly after our inspection and dispose of that waste as K061 hazardous waste.

Also we concurred with the Stockpile Sampling Plan you submitted on December 4, 2015, to address that entire area of the site. After the waste is characterized you plan to develop a removal plan. Please submit the results of your pile sampling.

- b.) On August 26, 2015, we observed one full cubic yard bag and one half full cubic yard bag of waste aerosol cans that were unlabeled and undated. We were told that these wastes would have started accumulating immediately following the last shipment of these wastes off-site. Since the last shipment

of this type of waste was February 24, 2015, it appears WSH stored hazardous waste aerosol cans (D001) for over 90 days without a storage permit. We understand these 2 containers of waste were sent off-site for disposal on September 2, 2015.

- c.) EAF dust was leaking from the inclined conveyor at the outlet of the baghouse onto the ground. Your status update on 9/16/15 indicates that the leaked dust was shoveled and vacuumed up by Odyssey Environmental Services and properly disposed. You have instructed your baghouse operator to perform thorough inspections and submit work orders as needed regarding maintenance items.
- d.) EAF dust appeared to be leaking from the connection of the baghouse outlet to the hazardous waste container. Please indicate how you have addressed this issue.
- e.) Any EAF dust that leaks from the baghouse can escape to the soil around the baghouse. The soil surface around the baghouse has the color, consistency and appearance of fugitive baghouse dust. Please indicate how you have addressed this issue.

Due to the unlawful establishment and operation of a hazardous waste facility in each of the above situations, WSH is subject to conducting closure at the Facility, pursuant to OAC rules 3745-55-10 through 3745-55-20. Closure is the clean-up procedure for all areas where hazardous waste has been managed. Generally, closure activities entail the following: removing and management of all waste and residues, removing or decontaminating contaminated equipment and structures, remediating contaminated soils and groundwater if necessary, and managing all wastes generated from these activities in accordance with the hazardous waste laws. Furthermore, the closure process requires the submittal and approval of a closure plan which ensures that the closure performance standards set forth in OAC rule 3745-55-11 are met. The closure performance standards require the removal and remediation of any contamination in these areas to prevent that contamination from posing a risk to human health or the environment. The closure plan is normally prepared in accordance with Ohio EPA's *Closure Plan Review Guidance for RCRA Facilities* and a copy of that guidance can be found at

<http://epa.ohio.gov/Portals/30/RCRA/docs/Closure%20Plan%20Review%20Guidance.pdf> .

Since WSH has violated ORC 3734.02(E) & (F), WSH is subject to all applicable general facility standards found in OAC 3745-54 and 55. Also, at any time Ohio EPA may assert its right to have WSH begin facility-wide clean-up pursuant to the Corrective Action process under Ohio law.

2. Waste Determination – OAC 3745-52-11 *Any person who generates a waste must evaluate the waste to determine if the waste is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51.*

- a.) WSH had not evaluated the wastes in numerous outdoor waste piles located on the southwest portion of the site. Mr. Scheel provided information concerning the nature of the wastes in the piles. The white piles were lime from clean-up of the roadways by Odyssey. Broken cubic yard bags of lime were observed in some of these white piles. The greyish-blackish piles with flakes of metal in them were identified as mill scale from the scale pit by the caster. The brown piles were identified as drop-out box waste. Most of the brown piles had a crusty surface or a sludge-like appearance to them. But there was one approximately 1 cu. yd. pile we observed that consisted of very fine brown dust that became airborne when disturbed and that had fresh tire tracks leading up to it. Mr. Scheel and you did not know how it got there, who put it there or what it was.

We understand you had contractors review the various waste piles on September 11, 2015. Stein will be removing and selling the mill scale piles. We understand you did representative sampling of the lime piles located west of the WSH Melt Shop and determined they are not a hazardous waste in accordance with OAC 3745-52-11. Your determination and analyses were submitted on October 14, 2015. You plan to send the lime piles for disposal at a municipal landfill or send off-site for recycling.

On December 4, 2015, you submitted a revised "Stockpile Sampling Plan" prepared by BJAAM Environmental. On December 4, 2015, we agreed with your proposal to implement the plan. Please submit the results of your sampling.

- b.) WSH did not have a current evaluation of the drop-out box waste. On November 4, 2015, you submitted your TCLP analysis and determination that this waste is non-hazardous. No further action is needed at this time.

- c.) WSH did not have a current evaluation of the hazardous characteristics of the electric arc furnace (EAF) dust. On November 4, 2015, you submitted your TCLP analysis and determination that this waste in addition to being a listed hazardous waste also fails TCLP for lead. No further action is needed at this time.
- d.) At the west end of the 35" Mill we observed a pit or underground tank containing a black oily liquid. Mr. Scheel indicated it was unwanted or a waste and speculated it was left over from Copperweld's rolling mill process. On November 9, 2015, you indicated recent analysis found PCBs in this oil. You stated WSH is investigating engineering drawings to try to determine how big the pit might be to plan for the removal of its content. Also please describe your plans for the management and disposal of this waste with a schedule for each activity.
- e.) During the week of August 24, 2015, WSH was having refractory brick replaced in the drop-out box. Please submit your waste determination for the removed brick.

3. Incomplete Manifests – OAC 3745-52-20(A)(1) *A generator who offers for transport a hazardous waste for off-site treatment or disposal must complete a manifest for that waste.*

Several manifests did not have item 11, total quantity, completed. These manifests included one from 7/7/15, 7/8/15, and 8/5/15 and two from 8/3/15. You were able to obtain the weight from the 'Scale Weigh Ticket' for each of these. Please describe what procedures have been instituted to prevent these omissions in the future.

4. Signed Manifest Retention – OAC 3745-52-40 *A generator must maintain signed copies of manifests for at least 3 years.*

The designated facility signed copy of the 2/24/15 manifest for waste aerosols sent to Ross Incineration Services was not on file. On 8/28/15 you provided a copy of this manifest to me via e-mail adequately addressing this violation. No further action is required at this time.

5. **Personnel Training Program – OAC 3745-65-16(A)(1-3), (B), (C), (D)(1-4) and (E)** *A generator must provide a training program to all facility personnel involved in hazardous waste management that is directed by a person trained in hazardous waste management procedures. The program must include job titles for each position related to hazardous waste management with the names of every employee filling those titles. It must include job descriptions with the requisite skill, education or other qualifications and the duties. There must be a written description of the type and amount of both introductory and continuing training that will be given to each of these employees and that training must include contingency plan implementation. Records must be kept documenting that the described training has been completed by each of these individuals.*

Although some training has been given related to fire extinguishers and some emergency action training has been conducted for the Chemical and Etch Lab employees, a comprehensive training program that addresses all of the above aspects was not available. You indicated in your 9/16/15 update that you are developing your contingency plan first so that training on it can be conducted.

Please submit a personnel training program that includes all of the required elements, including documentation that the required training has been completed. Here is a link to an example of job titles and job descriptions. http://ohioepapubs.custhelp.com/app/answers/detail/a_id/1827/kw/example%20personnel%20Training/session/L3RpbWUvMTQ0NDIyNzAyMi9zaWQvM3p6UUUVseW0%3D

6. **Spill Response – OAC 3745-65-52(A)** *A generator is required to have a contingency plan that addresses the response to any release of hazardous waste or hazardous waste constituents.*

Although WSH has an Emergency Action Plan (EAP), not all components of the required contingency plan are included. In particular, response actions for a hazardous waste spill are not included.

Please revise and submit a contingency plan addressing hazardous waste spills. Once the plan is revised and updated it will need to be submitted to all emergency authorities that may be requested to provide emergency services in accordance with OAC 3745-65-53(A) & (B).

- 7. Arrangements with Emergency Contractors – OAC 3745-65-52(C)** *The plan must describe arrangements agreed to by contractors for emergency services.*

The EAP lists a contractor for chemical spill response that Mr. Scheel stated WSH would not call in an emergency. Please update your emergency contractor information in your contingency plan and submit a copy of the revised plan.

- 8. Emergency Coordinator Information – OAC 3745-65-52(D)** *The contingency plan must list the current names, addresses and phone numbers (office and home) of all persons qualified to act as the emergency coordinator.*

The EAP did not include addresses for the emergency coordinators. Please revise and submit a contingency plan that includes the home addresses for the emergency coordinators.

- 9. List of Emergency Equipment – OAC 3745-65-52(E)** *The contingency plan must contain a list of all emergency equipment including a brief description of the equipment, a brief outline of its capabilities and its location.*

This list was not included in your EAP. Please revise and submit a contingency plan that includes the required list and related information.

- 10. Emergency Equipment Inspections – OAC 3745-65-33** *Emergency equipment must be inspected as necessary to ensure its proper operation in an emergency and those inspections must be recorded in a log.*

Emergency equipment has not been inspected and therefore inspections have not been recorded in a log either. At our August 26, 2015 visit you informed us that you started doing inspections of emergency equipment the day before and gave us a copy of your completed inspection form for 8/25/15. Please include all emergency equipment items that are included in your revised and updated contingency plan. (See previous violation.) Please submit a copy of your completed inspection form that reflects that the emergency equipment listed in your revised and updated contingency plan is being inspected.

- 11. Container Labeling – OAC 3745-52-34(A)(3)** *Containers of hazardous waste must be labeled with the words "hazardous waste".*

One full cubic yard bag and one half full cubic yard bag of waste aerosol cans in the Shipping Department in the Service Garage Building were not labeled or dated. Also six drums of waste aerosol cans in the No. 5 Shipping Area in the 21" Mill Building were not labeled or dated.

You submitted a manifest documenting these wastes were sent off-site on 9/3/15 and you now have one steel drum to collect waste aerosols under the satellite accumulation provisions. Also you have developed aerosol can management instructions with training and are investigating the purchase of a can puncturing device. These actions adequately address this violation at this time.

12. Container Dating – OAC 3745-52-34(A)(2) *The date upon which each period of accumulation begins must be clearly marked and visible for inspection on each container.*

- a.) As described in the previous violation, two cubic yard bags and six drums of hazardous waste were not dated with the accumulation start date. You submitted a manifest documenting these wastes were sent off-site on 9/3/15 and you now have one steel drum to collect waste aerosols under the satellite accumulation provisions. Also you have developed aerosol can management instructions with training and are investigating the purchase of a can puncturing device. These actions adequately address this violation at this time.
- b.) Three containers of K061 EAF dust in the front parking lot on August 21, 2015, were not dated. Proper dates were added during the inspection, addressing this violation.

13. Closed Containers – OAC 3745-66-73(A) *Containers of hazardous waste must be stored closed.*

One vac box (V4014) containing K061 EAF dust located to the east of the baghouse was being stored without its inlet cap in place. Your status update on 9/16/15 indicates the cap was replaced and those wastes have been shipped off-site. This adequately addresses this violation. No further action is required at this time.

14. Container Inspections – OAC 3745-66-74 *Hazardous waste accumulation areas must be inspected at least once during the period Sunday through Saturday each week and those inspections must be recorded in a log.*

- a.) The areas where the two bags and six drums of waste aerosol cans were being stored had not been inspected weekly and therefore those inspections were not recorded either. You have replaced these areas with one satellite drum adequately addressing this violation.
- b.) Also weekly inspection logs were not available for the areas storing boxes of EAF dust (K061) from 6/29/12 through 8/21/15. On 8/26/15 you provided us with a copy of your newly completed inspection log from 8/25/15 and stated your intention to conduct and record weekly inspections going forward. Please clarify if the area at the front southeast portion of the site is being inspected as well as the areas around the baghouse.

15. Condition of Used Oil Containers – OAC 3745-279-22(C) *Containers utilized to store used oil must be in good condition with no leaks.*

Several drums of used oil that we observed on 8/21/15, appeared to be leaking or overfilled. Used oil was running down the outsides of the containers and had stained the soil around them. You submitted photos showing these areas after they were cleaned up and you submitted manifests documenting the oil and stained soil were shipped off-site on 9/1/15. No further action is required at this time.

16. Used Oil Container Labeling - OAC 3745-279-22(C) *Containers of used oil must be clearly labeled "used oil".*

Numerous drums and totes of used oil at various locations on the site were not labeled as such. You submitted photos of the contractor vacuuming out totes of used oil and shipping papers showing the empty containers were sent off-site. Photos were also submitted that show the areas where containers of used oil were being stored, are now vacant. Manifests documenting the oil and stained soil were shipped off-site on 9/1/15 were also submitted. No further action is required at this time.

17. Used Oil Releases – OAC 3745-279-22(D) *Upon detection of a release of used oil the generator must stop the release, contain the release, clean up the released used oil and repair or replace the leaking container.*

Several drums of used oil that we observed on 8/21/15 appeared to have been leaking or overfilled. Used oil was running down the outsides of the containers and had stained the soil around them. Manifests documenting the oil and stained soil were shipped off-site on 9/1/15 were submitted. You also submitted photos of these areas after they had been cleaned up. No further action is required at this time.

18. Waste Analysis – OAC 3745-54-13 *As a facility subject to all applicable general facility standards found in OAC 3745-54 and 55, WSH must obtain a detailed chemical and physical analysis of a representative sample of wastes in order to properly treat, store or dispose of those wastes.*

Many of the buildings on the site were abandoned by Copperweld and are in various states of disrepair and are unused by WSH. Some have vacated equipment pits now holding liquid. WSH needs to inspect the facility and identify any tank, pit, vat, container, pile or other area where wastes might be present. Then WSH needs to determine if any wastes in these abandoned buildings are a hazardous waste in accordance with OAC 3745-52-11. If any are a hazardous waste, then those wastes will need to be managed properly including immediate disposal off-site.

Please submit a waste analysis plan identifying all abandoned wastes and describing how representative samples will be obtained and analyzed so that they can be properly disposed.

WSH needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within 14 days of receipt of this letter, please provide the requested documentation to this office. The documentation may be submitted via the postal service or electronically to sherry.slone@epa.ohio.gov. Please be advised that violations cited above will continue until the violations have been properly abated. Failure to comply with Chapter 3734 of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, you are requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

MR. BRIAN DULLY, MGR. EH & S
WARREN STEEL HOLDINGS
JANUARY 12, 2016
PAGE 11

Enclosed is a copy of the checklists that we completed as a result of the inspection. The hazardous waste rules cited can be found on our division's web page at <http://www.epa.ohio.gov/dhwm/>. Our division has an electronic news service to provide generators with updates related to hazardous waste activities in Ohio. You can sign up for this free service at http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage. Our Office of Compliance Assistance and Pollution Prevention (OCAPP) offers non-regulatory on-site pollution prevention assessments. If you are interested in an assessment, you can visit OCAPP's website at: <http://www.epa.ohio.gov/ocapp>.

If you have any questions concerning this letter, please contact me by telephone at (330) 963-1226 or by e-mail at sherry.slone@epa.ohio.gov.

Sincerely,



Sherry Slone, PE
Lead Engineer
Division of Materials and Waste Management
Northeast District Office

SS/nvr

Enclosures

cc: John Palmer, NEDO DERR
Natalie Oryshkewych, NEDO, DMWM
Marlene Kinney, NEDO, DMWM

ec: Nyall McKenna, NEDO, DMWM
Jeff Mayhugh, CO, DMWM
Tammy McConnell, CO, DMWM
Frank Zingales, NEDO, DMWM
Richard Dezsi, MTAPCA
Tony Becker, NEDO, DAPC
Jamie Paulin, USEPA
Todd Anderson, CO, Legal
Mitch Matthews, CO, DMWM

Warren Steel Holdings

OHR 000 007 773

Narrative Report

8/21/15 & 8/26/15

Sherry Slone

Participants on 8/21/15

Sherry Slone – OEPA NEDO DMWM HW

Frank Zingales – OEPA NEDO DMWM HW

Ed Perez – OEPA NEDO DAPC (left early)

Tony Becker – OEPA NEDO DAPC (left early)

Brian Dully – WSH, EHS MGR

John Scheel – WSH, VP&GM

Tara Cioffi – YCHD, Env/Air Pollution Director (joined for part of inspection)

Richard Dezsi – MTAPCA (joined for part of inspection)

Mike Ritz – WSH, Head of Maintenance (joined for part of inspection)

Paul Albrecht – WSH, tracks K061 boxes (joined for part of inspection)

John Rogers – WSH, bag house operator (joined for part of inspection)

Participants on 8/26/15

Sherry Slone – OEPA NEDO DMWM HW

Frank Zingales – OEPA NEDO DMWM HW

Brian Dully – WSH, EHS MGR

John Scheel – WSH, VP&GM

General Facility Description

Warren Steel Holdings (WSH) manufactures various sizes of solid steel billets primarily (99%) from scrap steel. Many different types of alloys may be added including aluminum, copper, nickel, chrome, titanium, boron, and vanadium but no lead. They buy about 15 different types of scrap from their broker, Tube City.

The facility is situated on about 370 acres of the former Copperweld site. Copperweld still owns about 100 acres to the southwest. Ohio Star Forge is located on a parcel in the northwest part of the site on land that Ohio Star Forge owns. Scrap Metal Services (SMS) is located near Mahoning Avenue north of WSH's main gate. Stein operates the slag area of their site. The currently operating melt shop occupies about 20 acres. There are many abandoned Copperweld production buildings on the property in states of disrepair. All of these have had the production equipment removed and there are equipment pits left in some. Some of the equipment pits contain unknown liquids. Parts of some of the abandoned buildings are being used for material storage. Over the next 1 ½ years WSH plans to tear down the unused buildings after completing asbestos abatements on each.

The facility operates 24 hours per day, 5 days per week. The electric arc furnace has a 100 ton capacity. There are about 180 employees with 150 of those, hourly plant workers

Entrance Interview / Process Description

At about 10:10 AM on 8/21/15, the Ohio EPA participants named above arrived at the WSH site and requested to meet with the environmental representative. We met with John Scheel and Brian Dully in the Engineering Building. John explained that Brian had just started in this position 3 days earlier. John started with WSH late in 2013. I explained that we had received a complaint concerning the mismanagement of hazardous waste and that we wanted to do a large quantity hazardous waste generator compliance evaluation inspection (LQG CEI). From our files it appeared the last LQG CEI was conducted in 2011 by USEPA.

The process of steel making starts with SMS loading buckets with scrap metal via a crane in accordance with a recipe. The bucket is taken into the scrap bay of the melt shop. The roof of the empty furnace is opened and ~50 ton of scrap is dumped from the bucket into the top of the furnace. Electricity and oxygen are used to melt the scrap at about 3000 degrees F for 25 minutes. Lime flux is added to remove impurities from the steel and it forms slag. A second bucket of scrap is added and melted for another 25 minutes. Slag is removed from the furnace on the east side. It is taken to the slag part of the site which is located south of the melt shop and operated by Stein. Stein magnetically separates the metal from the slag and the metal is reused by WSH. The remaining part of the slag is sold by Stein and is believed to be used for roadbed material.

About 85-90 tons of liquid steel is tapped out the west side of the EAF into a 100 ton capacity ladle. Alloys are added. Alloys include silicon, aluminum, copper, nickel, chrome, boron, titanium, vanadium... about anything except lead. The ladle goes to the metallurgy furnace (LMF) where it is stirred and reheated at a very controlled temperature. From the LMF the molten steel goes to the degasser which is a vacuum tank that pulls out the hydrogen. From there it goes to the caster. Different sizes of square, round and rectangular solid billets can be cast. Mostly rounds are in the yard now and they were casting ~6 inch squares. The castings are sprayed with water and that water is collected and goes with storm water to the lagoons on the south side of North River Rd. The process water is treated through a chemical treatment plant and then mostly re-used in the plant. WSH does hold an NPDES permit to discharge to the Mahoning River if necessary. Waste water treatment sludge is pressed and disposed in a regular solid waste landfill. The sludge was tested in late 2014 and determined to be non-hazardous.

There is no rolling mill at the facility. John stated they avoid using lead for the protection of their employees and the environment. All of their scrap goes through SMS where 3 inspectors inspect each load. All mercury switches must be removed. SMS also maintains a list of rejected scrap suppliers and they don't do business with them.

Billets can be cooled by burying in sand piles indoors or outdoors. Indoor sand piles for this purpose are located toward the north end of Conditioning Shed No.1. The outdoor sand pile is located south of the Ohio Star Forge property and west of Conditioning Shed No. 3.

Dust and debris are generated in the EAF. The dust is evacuated from the roof of the EAF and transported more than 500 feet via a large air duct to the baghouse. Near the EAF, the larger particles and debris fall into the drop-out box. USEPA has interpreted that drop-out box wastes are not K061 hazardous waste but are a solid waste that may be a characteristic hazardous waste. This waste was determined to be non-hazardous in 2007 by WSH. A recent sample has been sent for analyses. WSH employees use a bobcat to scoop out the drop-out box about once per week and this waste is taken to the slag plant. (The refractory brick in the drop-out box was being replaced during the week of August 24th.) WSH stated that they consider the dust that exits the dropout box and in the ductwork to the baghouse as K061 hazardous waste.

The baghouse was built in the 1980s and consists of 16 modules. Each module contains 228 bags that are 34 feet long. Three fans blow the EAF dust from the air duct into the baghouse. Screw conveyors are located below the 16 modules which convey the EAF dust to a single conveyor that discharges to a vac box on the south side of the baghouse. About 40 pounds of EAF dust is generated per ton of liquid steel. On the day prior to our inspection, 11 heats were done producing about 990 tons of liquid steel and about 20 tons of EAF dust. Paul Albrecht indicated that usually about 1 roll-off and 1 vac box are shipped out each day that the facility produces steel. A tracking sheet is used to ensure that the K061 hazardous waste is shipped off every 90 days. Roll-offs are used to contain sweepings from the baghouse floor. The vac boxes have a maximum weight limit and if that is exceeded the excess dust is transferred to a roll-off box as well. The roll-off boxes and vac boxes are managed as hazardous waste (K061) containers and stored to the east and south of the baghouse as well as the parking lot out front at the southeast portion of the site. According to the tracking sheet there were 10 vac boxes and 8 roll-off boxes on-site at the time of the inspection. Odyssey Environmental Services is an outside contractor retained by WSH to manage the K061 hazardous waste. Odyssey cleans out the air duct to the baghouse when needed. They also clean up any spillage/leakage around the baghouse and on the pad beneath the bags with a vac truck once per week according to John Rogers. The baghouse was last cleaned in July when there was a power failure. The K061 is transported off-site by Enviroserve utilizing a manifest.

Used batteries and lamps are accumulated in containers in the Craft Shop. They are managed as universal wastes. Currently there are no used lamps accumulating. Universal wastes have been sent to Veolia via Enviroserve.

Used oil is generated during maintenance activities such as changing out gear boxes. It is accumulated in the Craft Shop as well. John wasn't sure where it was sent for recycling.

Spray paint is used to identify types or grades of billets and therefore aerosol cans are another waste stream generated. WSH considers them a D001 hazardous waste. The last shipment of these was to Ross Incineration Services (OHD048415665) on 2/24/15.

Part way through John's process description, Tara Cioffi and Richard Dezsi from the local air agency joined our meeting.

Walk-through on 8/21/15

After lunch, Frank Zingales, Ed Perez, Tony Becker, Tara Cioffi, Richard Dezsi, and I accompanied Brian Dully and John Scheel on a walk-through of the facility. We left the engineering building and proceeded to the baghouse. On the way to the baghouse we observed about 15 totes and 6 drums outside toward the east end and on the south side of the Old Charging Building. (See photos #6939-6947.) John said they all contained used oil. The hydraulic or gearbox oil was generated in the caster or melt shop. Five of the totes were unlabeled. Ten totes were labeled "used oil". Three drums were labeled "used oil" but another three were labeled "scrap oil". I pointed out to John and Brian that all containers of used oil need to be labeled "used oil". We walked on towards the baghouse.

The soil in this entire portion of the site has a brownish color similar to EAF dust. John Scheel and John Rogers indicated that it was just slag dust on the ground around the baghouse and when it is scraped up it is put on the slag pile to the south of the baghouse. There was minimal dust on the concrete pad below the bags. John Rogers stated that if dust is found under the bags it is swept into a pile and then Odyssey vacuums it up once per week with their vac truck. One 20 cu. yd. vac box (V4014) full of EAF dust was located on the east side of the baghouse. It was labeled "hazardous waste, EAF dust, K061" and had an accumulation start date of 8/12/15. The outlet portal was open. On the ground around it appeared to be brown EAF dust. (See photos #6948, 6949, 6955, 6971, 6972, and 6973.) Also on the east side was a full 30 cu. yd. roll-off box (WSH3045) labeled "hazardous waste, EAF dust, K061" and dated 8/11/15. We observed a leak in the incline conveyor that conveys the EAF dust to the outlet chute to a roll-off box. (See photos #6950 and #6970.) This leak of brown EAF dust was to the ground inside the shed at the southeast corner of the baghouse. I was told that years ago there was not a shed there and that the baghouse dust was just dumped onto the ground in a pile at that location. At the conveyor outlet was a 30 cu. yd. roll-off box (SEV3041) labeled "hazardous waste, K061, EAF dust" and dated 8/21/15. (See photo #6961.) There appeared to be some waste leakage/spillage on the ground around this roll-off box. (See photo #6960.) John indicated Tara had found a hole in the sock that directs EAF dust from the conveyor into the roll-off box on a prior inspection, so they had replaced that sock. (See photo #6959.) On the south side of the baghouse were 3 more full roll-offs (WSH3043, WSH3046 and SEV3040) containing K061 hazardous waste. All were labeled "hazardous waste, K061, EAF dust" and were dated respectively 8/19/15, 8/18/15, and 8/20/15.

As we walked north from the baghouse we found another outdoor area east of the Blower Building with about sixteen 300 gallon totes and about fifty 55 gallon drums with content. Most contained unusable oil and some contained acids, greases and other wastes. Some were labeled and many weren't. Eight drums were marked "used oil", two drums were marked "waste oil", one drum was marked "old oil", one tote was marked "used oil", four totes were marked "used transformer oil", and three drums were marked "acid water". Some drums were

badly bulging and some were leaking black oily wastes onto the ground. In particular, a black oily liquid had been released from a drum labeled "used oil". (See photos #6979-6995.) Most drums were stored upright but some were lying on their side. Most drums had lids but some didn't and some lacked bungs. Most drums were on pallets but some weren't. John stated they needed to get rid of all of these containers and I explained that they needed to clean up the visual staining of the ground from used oil releases and again that all used oil containers need to be labeled "used oil".

As we walked past the abandoned No.1 Shipping Building, we looked in and saw three 55 gallon drums at the east end. One was unlabeled but contained trash. One was labeled "part" and dated 10/15/13, and the other one had no date and was labeled "full". These two drums reportedly contained empty aerosol cans. (See pictures #6998-7000.) As we walked westward within this building we observed seventy two half full plastic 55 gallon barrels lining the edge of old equipment pits. The barrels were labeled "non-potable water". Also in this area were 7 totes of water treatment chemicals labeled sulfuric acid and hypochlorite (Liquichlor) which they intend to use for water treatment. (See photos #7001-7006.)

We walked through the blue Machine Shop Building where supplies such as new oil and bags of alloys are stored. Outside to the west of this building, we found twenty-three 55 gallon drums with partial contents. One was labeled "used oil". One appeared to be leaking black oil and the pallet and ground below it were stained. (See photos #7008 -7014.)

Next we went into the abandoned 35" Mill Building also known as the Breakdown or Rolling Mill. The driveway through this building was lined with half full plastic barrels labeled "non-potable water". (See photos #7015 and 7017.) To the east of the driveway was an equipment pit that had been partially backfilled with gray looking soil and darker oily stained looking soil. (See photos #7015-7023.) We observed a steel barrel in the pit. John said they had been spreading piles that were here. Frank advised WSH that they need to determine the contents of that drum and they need to make certain their backfilling is in compliance with any solid waste rules. John also said they have been doing asbestos assessments on the abandoned buildings to see if they can be torn down. Outside we observed a ~15 inch square basin in the ground that was filled with dirt and debris. (See photo#7024.) Tara, Richard and Tony left at this point.

We then toured the process area including the charge area, the EAF, the LMF, the degasser, the slag cooling station, and the caster. Hot slag is cooled with a water spray outside to the south of the Melt Shop. (See photos #7037 & 7038.) The hot billets are cooled with water in the caster area and that cooling water goes to the lagoons. (Subsequent waste determination information indicated this is non-hazardous and monthly wastewater analysis for metals is well below TCLP limits.)

We walked past the lime solo, the drop-out box area, the metal scrap yard, and on towards the front parking lot at the east end of the property where the hazardous waste vac boxes and roll-offs are stored. The scrap yard is directly west of the baghouse. (See photos #7050-7053.)

There were 10 hazardous waste boxes in the front parking lot. The boxes were labeled 'hazardous waste, EAF dust, K061". Three of those containers (V25154, V25157, and V25148) did not have an accumulation start date on them. Based on the scale tickets for these boxes when they arrived at the site empty, WSH was able to apply conservative dates to these boxes. All of the boxes were closed, in good condition, stored less than 90 days and were properly labeled. (See photos #7054-7060.)

About 4:30 PM we left the site.

Records Review on 8/26/15

Frank and I arrived on-site about 9:45 on 8/26/15 and met with John Scheel and Brian Dully to first review records. John and Brian provided us with an update on what they had been doing to address our concerns over the past few days. An Enviroserve representative had walked the site with Brian and was back this day to sample the wastes that we had observed during our walkthrough on the 21st. Enviroserve had provided WSH with a proposal to sample, characterize, consolidate, transport, and dispose of the wastes. Their contract will include the drums and totes we observed as well as soil clean-up from oil leaks. A tank that previously had a leak was drained into drums and stained soil from that leak was also placed in drums. Those drums are currently staged for removal in the northeast corner of the Cold Draw No. 4 Shipping Area.

John indicated the abandoned buildings may contain pits with liquids and WSH intends to address those as they are slated for demolition. John indicated that asbestos abatement was completed for the next 3 buildings that are slated for demolition in the next 2 weeks. These 3 buildings include the Old Charging Building, the Old Melt Shop, and the Stripper Building. The next group of buildings to be demolished over the next 6 months includes Conditioning No. 1, 2 & 3 Sheds. Following this second group would be the abandoned buildings from the central part of the site to the north and that is planned to occur within about 6 months following the second group. The totes and drums of sulfuric acid and hypochlorite and other water treatment chemicals found in the buildings will be used for water treatment purposes.

John said that the material going into the abandoned equipment pit in the 35" mill was soil scraped from the floors of buildings that are slated for demolition. He stated that the pits that were filled did not contain any liquids. He also indicated the lighter colored soil had lime in it and the darker material was just "normal soil".

We reviewed their Emergency Action Plan, recent manifests, inspection logs and available training documentation. WSH did not have a hazardous waste contingency plan but did have an Emergency Action Plan (EAP). The EAP did not include a response plan for hazardous waste spills and did not have a list of emergency equipment with its location and capabilities. It also did not include the addresses for the emergency coordinators. The EAP listed Schaffer Industrial Services as a contractor for chemical spills however John indicated they would not call them in an emergency. The plan needs to be updated to include all of the required elements.

Weekly hazardous waste container inspections that included emergency equipment in the baghouse area were available and provided to us for 7/29/15 through 6/29/12. Weekly inspections were not available for the time period 6/29/12 through 8/21/15.

Manifests for July 2015 through the present were reviewed. Several were missing item 11, total quantity. These manifests included one from 7/7/15, 7/8/15, 8/5/15 and two from 8/3/15. Later Brian was able to provide the weights from the scale tickets. One manifest on 2/24/15 of D001 aerosols to Ross did not have a return to generator copy available at the inspection. (This was later provided.) Documents were available showing universal waste lamps were sent to Veolia on 9/25/14. No shipping papers for used oil could be found.

Training documentation indicated EAP training had been given to the Chemical and Etch Lab employees on 5/27/15. Brian stated he had DOT training in May 2015 and reads the 40 CFR frequently. A description of the type and amount of training to be given to those employees involved in hazardous waste management was not available nor were job titles and job descriptions for those involved in hazardous waste management. Annual refresher training is needed for everyone involved in hazardous waste management including emergency coordinators and it needs to include response to hazardous waste spills and the revised and updated contingency plan.

Terry LNU, who is responsible for the water treatment system stopped in and gave us an overview of the system. Process wastewaters go to the lagoons. Water is pulled from the lagoons and sent through clarifiers that settle the solids out. The sludge is sent to a holding tank and then processed through a filter press. The solids from the press drop into a roll-off box. Enviroserve picks up the roll-off box and takes to a regular landfill. The sludge was analyzed late last year and confirmed to be non-hazardous. The clarified water is reused in the processes. Port-a-pots are utilized throughout the site so only sanitary wastes from the offices are treated through the treatment system.

Walkthrough on 8/26/15

In the afternoon we continued our facility tour with John Scheel and Brian Dully. We started at the Shipping Department which is located in the Service Garage Building. This is the primary storage location for waste aerosol cans. We met Chris LNU. We observed one full cubic yard bag and one half full cubic yard bag of waste aerosol cans. Neither container was labeled or dated. (See photos #7061-7064.) The half full bag was not closed. They have not been inspecting this area as a < 90 day accumulation area. We were told these wastes had probably been accumulating since the last time this type of waste was shipped off-site. We discussed the requirements for satellite versus generator storage areas and Brian indicated they would remove these wastes on 8/28 and place a 55 gallon steel drum in this area and begin to manage it as a satellite accumulation area.

We met Larry Frangos, the VP of Odyssey Environmental Services. We were told he comes daily, and their company does work weekly regarding K061 wastes. Quarterly they clean the ductwork and baghouse. Their work includes putting the K061 into vac boxes, replacing bags in the baghouse, cleaning the pad below the baghouse, vacuuming the top of the ducts and the

inside of the ducts, vacuuming up any fugitive dust around the baghouse, cleaning up the EAF dust that has leaked out of the inclined conveyor and collecting previously generated oily water. The oily water was sent to Everclear. Lime dust collects on the crane rails and Odyssey cleans the rails and takes those lime wastes out back to the slag area. (A TCLP was performed on the lime waste on 9/11/15 and this waste was determined to be non-hazardous.) They are planning to reuse this waste for agricultural purposes.

Next we walked to the No. 5 Shipping Area in the 21" Mill Building. There were six 55 gallon steel drums that were full of aerosol can wastes. (See photos #7066-7069.) None were labeled or dated. We were told this is where the billets get painted. Lids and duct tape across the lids were on each. These were scheduled to be sent off-site on 8/28/15. Also the 2 drums of aerosol cans from the No. 1 Shipping Building that we observed on 8/21/15 will be brought over and sent out with these.

At the No. 4 Shipping Area of the Cold Draw Building, we observed four plastic 55 gallon drums labeled "used oil and dirt", and 3 plastic and 3 steel drums labeled "used oil". We were told a tank was dropped and broke leaking used oil onto the ground. These drums were the result of emptying the remaining contents of that tank and cleaning up the spillage. (See photos #7072-7075.)

Sand piles for cooling billets indoors are located at the north end of the No. 1 Shed of the Conditioning Building. The sand has never been a waste and has not been disposed. Also refractory material storage was occurring here. (See photo #7076.) To the west of this building and south of Ohio Star Forge is the sand/slag pile used for cooling the billets outside. (See photos #7076 & 7077.) Abandoned equipment pits were found in Sheds No. 1, 2 & 3 of the Conditioning Building. Some contained liquids and some didn't. We explained that they needed to go through all of the abandoned buildings and determine what wastes are in each and if those wastes are hazardous. (See photos # 7079-7083.) Totes and boxes of products or raw materials were being stored near the south end of Sheds No. 1 and No. 2. At the west end of the 35" Mill we found an open manhole to a below grade tank or pit with liquid in it. Dipping a piece of paper in it revealed it contained a black oily substance. John indicated it was unwanted or a waste and speculated it was left over from the rolling mill process. (See photos # 7084-7086.) John stated the site was occupied by Copperweld through 2001, by American Steel and Alloys in 2002 and then WSH in about 2005 or 2006. From 2009-2011, WSH started making some steel, and then in 2012 they started earnest production of steel.

Outside, to the west of the Melt Shop, we observed a very large pile of unwanted pallets. (See photos #7089 & 7090.) John said they wanted to get rid of them but weren't successful in finding a reliable outlet. I told him I would send them some information on that.

As we walked south from the pallet pile, we saw a pile of refractory brick from the drop-out box on the ground. (See photos #7092 & 7093.) John didn't think there should be heavy metals in drop-out waste or the drop-out box refractory brick. (Subsequent sampling of the drop-out box waste showed all heavy metals below TCLP levels.)

As we continued to the open, southwest part of the site we found numerous piles of wastes. (See photos # 7094- 7109.) John provided information concerning the nature of the wastes in the piles. The white piles were lime from clean-up of the roadways by Odyssey. Broken cubic yard bags of lime were observed in some of the piles. The greyish-blackish piles with flakes of metal in them were identified as mill scale from the scale pit by the caster. The brownish piles were identified as drop-out box waste. Most of the brown piles had a crusty surface or sludge like appearance to them. But there was one approximately 1 cu. yd. pile we observed that was a very fine brown dust that became airborne when disturbed and that had fresh tire tracks leading up to it. John and Brian did not know how it got there, who put it there or what it was. John stated that their previous Environmental Health and Safety Manager, Donny Prater, left in June and his employee, Chris Kowach, left in mid-July. Brian just started the prior week on August 19th. John thought Larry would know so he called him and asked him to meet us at the site. While waiting for Larry to arrive, we walked further south to a pile that was black, gray and orange and had rags, wood, and steel pieces in it with some vegetation growing on top of it. This pile is believed to be from Copperweld and is on Copperweld's property. Based on its appearance, John thought it had been there for over 20 years. (See photos #7110-7114.)

When Larry arrived, we returned to the southwest area of WSH's property where the numerous piles were located. Larry explained that Odyssey only dumps pit scale and lime on the southwest part of the site. He thought most of the piles in this area had 'been here a long time'. Larry said he's been working at this site for 3-4 years and most of the piles were here when he started. He said 3 years ago scale was being reclaimed but that had stopped for some reason. He said all baghouse dust that Odyssey vacuums up goes into a box. We all walked over to the fresh pile of fine dust and we asked Larry if he knew what it was, how it got there or who put it there. (See photos #7106-7109, & 7115.) Larry and John both said it looked like EAF dust. Larry did not know how it got there or who put it there but said none of his employees would have dumped it there because 'they know better'. Larry said he has 4-8 people that work for him, and he is not always on-site while his crews are. He said Chad Johnston or Steve Grueber, his business partner, would be on-site if he wasn't while his crews are working. He reiterated that Odyssey only handles EAF dust from the ductwork to the baghouse and from the baghouse and it all goes into boxes. He said mill employees are responsible for drop-out box maintenance and management of waste from it. Larry said he had made a proposal last winter to WSH to clean up this part of the site, suggesting that much of the waste could be reclaimed. We reiterated to John that it is WSH's responsibility to evaluate all wastes generated and manage them properly. If this is EAF dust it should be cleaned up immediately. Larry left.

Next we went to the drop-out box area located inside the Melt Shop. A contractor was working on changing the refractory brick. There was a pile of recently removed refractory brick and sludge next to the drop-out box. (See photo #7117.) John said the drop-out box is cleaned out once per week.

In the Craft Shop we saw a parts washer (serviced by Crystal Clean), closed labeled containers for universal waste lamps and batteries, a closed labeled 55 gallon drum (satellite accumulation

container) of waste aerosol cans, and an unlabeled 55 gallon drum of used oil. The used oil drum was sitting on a secondary containment pallet and had a grate system on top of it. (See photos #7119 & 7120.)

Exit Interview

We returned to the Engineering Office to do an exit interview and were given a copy of the training matrix, the weight ticket associated with a manifest that did not have the weight filled in, EAF sampling results from 2007, and inspection logs from 7/29/11 through 6/29/12 and for 8/25/15. Ray LNU, the WSH accountant, gave us a very brief outline of the company history and structure. Of note was the plant was idled from 3/23/14 through 8/6/14 while they were negotiating a new electric contract with PUCO.

I summarized the issues and potential violations we found over the two day inspection.

- Three roll-off HW boxes containing K061 were not dated
- Weekly HW container inspections not documented
- Numerous totes and drums of used oil on various parts of site unlabeled or mislabeled
- Several areas where used oil had been released to the ground
- Vac box full of K061 dated 8/12/15 located east of baghouse had open outlet
- Pile of EAF dust on ground below a leak in the inclined conveyor at outlet of baghouse
- Appears EAF dust on ground along east and south sides of baghouse pad
- Manifest 014408856JJK did not have required weight completed on item #11
- No return to generator copy of manifest for aerosols going to Ross on 2/24/15
- Personnel training program needs job titles, job descriptions, contingency plan training and annual refresher for personnel. ECs need training on EAP/contingency plan. John Rogers was not on the training matrices that we were given
- No used oil shipping papers
- One full and one half full bags of spent aerosol cans were not labeled and not dated. No weekly inspections of this area were being conducted. The half full bag was not closed.
- Six full drums of spent aerosol cans in Shipping Area 5 were not dated and not labeled
- All of the pits in the abandoned buildings should have their contents evaluated as well as the contents of any waste containers found in those buildings. This waste should then be managed appropriately.
- A used oil drum in the Craft Shop was not labeled
- The contingency plan needs to be developed to include response appropriate for a HW spill, home and work addresses for ECs, and the emergency equipment list with capabilities
- Waste evaluation information is needed for drop-out box waste and EAF dust
- All of the piles on the southwest part of site need to be evaluated and properly managed.

I indicated I would be sending a follow-up letter and report but they should proceed with addressing issues and keep me updated on their progress. We left about 5:30 PM.

Warren Steel Holdings Photo Log
August 21, 2015
Sherry Slone

- 6939 – From east looking toward SW at ductwork leading to baghouse
- 6940 – East end of old charging building looking west at EAF ductwork
- 6941 – Totes and drums of used oil, grease and glycol from melt shop, caster area, and hydraulics, Total of 15 totes and 6 drums in this area
- 6942 – Five 250 gallon totes were unlabeled
- 6943 – Three drums were labeled “scrap oil” and not “used oil”
- 6944 – Drum labeled “scrap oil”
- 6945 – 330 gallon tote of unused glycol hydraulic fluid
- 6946 – Close-up of label on tote of pink fluid
- 6947 – Same as #6945
- 6948 – On east side of baghouse looking south
- 6949 – On east side of baghouse looking toward the SW
- 6950 – Horizontal screw auger from baghouse discharges EAF dust onto enclosed inclined conveyor that moves the EAF dust to vac box outside. EAF dust is leaking from the conveyor and piling up on the ground behind the ladder. We were told there used to not be a conveyor and the EAF dust used to just pile up on the ground in this area.
- 6951 – East side of baghouse looking west through south end of bag house, HW roll-off to the right
- 6952 – East side of baghouse looking north, HW roll-off and HW vac box. Vac box was labeled K061, dated 8/12/15 and full. Outlet port was open. Roll-off was labeled HW and dated 8/11/15.
- 6953 – Close-up of label on vac box east of baghouse. Box #V4014
- 6954 – East side of baghouse. HW roll-off in background.
- 6955 – East side of baghouse looking west
- 6956 – East side of baghouse looking toward the NW
- 6957 – Close-up of label on HW roll-off
- 6958 – HW roll-off on east side of baghouse
- 6959 – Discharge sock from inclined conveyor to vac box
- 6960 – Vac box attached to discharge of conveyor
- 6961 – Vac box at conveyor outlet, K061, 8/21/15, “HW”
- 6962 – South of baghouse, roll-off WSH3043, “HW”, 8/19/15
- 6963 – Close-up of WSH3043
- 6964 – Generator storage area for roll-off containers
- 6965 – Close-up of label on roll-off WSH3046, “HW”, 8/18/15
- 6966 – South of baghouse, roll-off WSH3046, baghouse in background
- 6967 – SW of baghouse, roll-off SEV3040, “HW”, 8/20/15
- 6968 – Close-up of SEV 3040 label
- 6969 – Gap in the top seam of the EAF dust inclined conveyor
- 6970 – Pile of EAF dust below incline conveyor
- 6971 – Looking north along the east edge of baghouse pad
- 6972 – East edge of baghouse pad
- 6973 – Ground at east edge of baghouse
- 6974 – West edge of baghouse pad
- 6975 – Three baghouse blowers
- 6976 – Air ducts from EAF furnace to the baghouse
- 6977 – Piles south of baghouse, ‘slag’ from around the baghouse

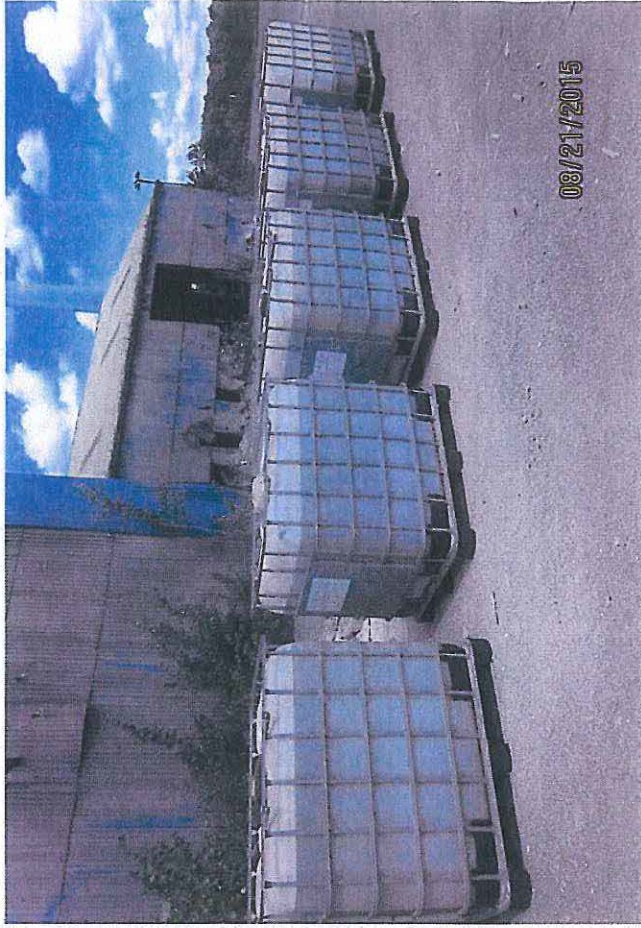
6978 – North side of baghouse looking toward SE
6979 – Area to NE of baghouse and south of old melt shop, "oil resting place", ~20-30 drums and ~30 totes, some empty, mostly used oil, one labeled "acid water", also see #6087 for overview, black stained soil, apparent used oil release
6980 – Released oil on ground
6981 – Drums in poor condition, black grease or oil on top and on ground, area to NE of baghouse
6982 – Stained ground in area to NE of baghouse
6983 – More stained ground in area to NE of baghouse near a drum labeled 'used oil'
6984 – Drums in area NE of baghouse
6985 – Open drums with what appeared to be a grease substance
6986 – Ditto
6987 – Overview of area NE of baghouse, "oil resting place", at center looking toward the east
6988 – Overview of "oil resting place", at center looking to the west
6989 – Center of "oil resting place" looking north
6990 – Tote labeled "used transformer oil"
6991 – Another drum labeled "used oil" leaking onto ground
6992 – Ditto
6993 – Containers marked "acid" and "acid water" in the area NE of baghouse
6994 – Drum labeled "acid water"
6995 – Center of "oil resting place", looking toward the east
6996 – Blue building in center is the warehouse, brick building to the left is the engineering building where we met with the environmental staff, the blue building to the right was abandoned and is labeled as the no.2 finishing mill on the facility map
6997 – Engineering building, with old abandoned stripper building in the background
6998 – Three drums on a pallet, toward the east end and inside the abandoned no. 2 finishing mill, one labeled "full", one labeled "10-15-13" and "part", and one unlabeled
6999 – Later we were told the "part" and "full" ones contained unwanted aerosol cans
7000 – The unlabeled one appeared to contain trash
7001 – Toward the west end of the abandoned no. 2 finishing mill were totes of water treatment chemicals and half-filled drums lining the edge of equipment pits in the floor
7002 – Half full drums of water placed at edge of floor pits, many were labeled "non-potable water"
7003 – Ditto
7004 – Water treatment chemicals
7005 – One of the equipment pits filled with water
7006 – Inside no.2 finishing mill, looking toward the west
7007 – Torn Supersack inside no. 2 finishing mill
7008 – Used oil drums and empties to the west of the warehouse, ~23 drums in this area, used oil released to the ground
7009 – Ditto
7010 – At west end of warehouse looking toward the west
7011 – Ditto
7012 – Looking toward the east from west end of warehouse
7013 – Ditto
7014 – Ditto
7015 – On driveway going through abandoned 35" mill, looking toward the east, half full non-potable water barrels lining the drive, equipment pit in the background
7016 – Blurry
7017 – Same as #7015

7018 – Close-up of fill material in equipment pits
7019 – Fill material in equipment pits
7020 – Ditto
7021 – Ditto
7022 – Drum in equipment pit near where filling had taken place, facility was advised that they should check with solid waste before filling pits
7023 – Fill area
7024 – South of 35" mill, perhaps a storm basin or a manhole to an underground tank, fill placed in it
7025 – South of 35" mill looking towards the east
7026 – Blurry, slag on floor
7027 – EAF in background, charging area
7028 – Molten slag on floor
7029 – Scrap bucket for charging furnace
7030 – EAF from control room
7031 – EAF, exhaust duct for dust
7032 – Blurry, metallurgy furnace in background
7033 – Metallurgy furnace area
7034 – Dusty atmosphere in the furnace area
7035 – Lid from degasser
7036 – Lid removed from degasser
7037 – Slag pile outside with sprinklers spraying the pile to cool it
7038 – Close-up of slag pile
7039 – Caster area
7040 – Ditto
7041 – Caster area
7042 – Ditto
7043 – Cutting billets with a torch
7044 – At NE corner of charging building looking towards the SE
7045 – At NE corner of charging building looking toward the west
7046 – At NE corner of charging building looking toward the NW, small lime pile on ground, lime is used as a flux in steel making to remove impurities from the steel, the impurities are poured off with the slag
7047 – Ditto
7048 – Dropout box area, front end loader cleans out about once per week
7049 – Ditto
7050 – Piles west of baghouse, bales of scrap
7051 – #2 bundles of scrap
7052 – Scrap steel piles
7053 – Scrap pile
7054 – HW box in front east lot, 7/18/15
7055 – V949 vac box,
7056 – In front lot looking east, brown roll-offs for scrap metal
7057 – HW box, 7/18/15
7058 – Overfill from box V949 is placed in this box
7059 – HW label, undated, 3 boxes were not dated (V25157, V25154, and V25148)
7060 – Close-up of HW label in #7059, undated



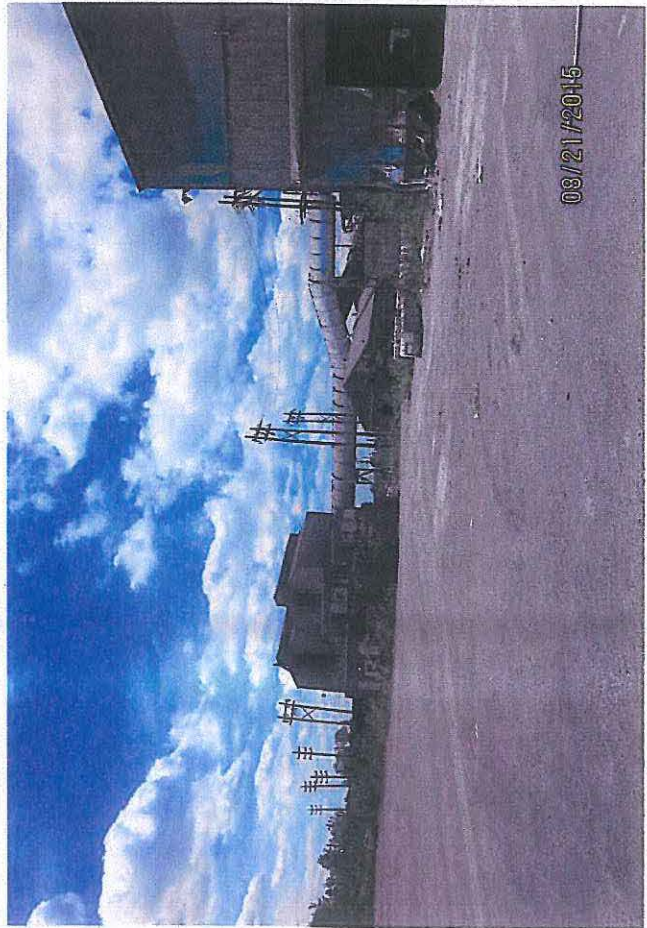
6940

03/21/2015



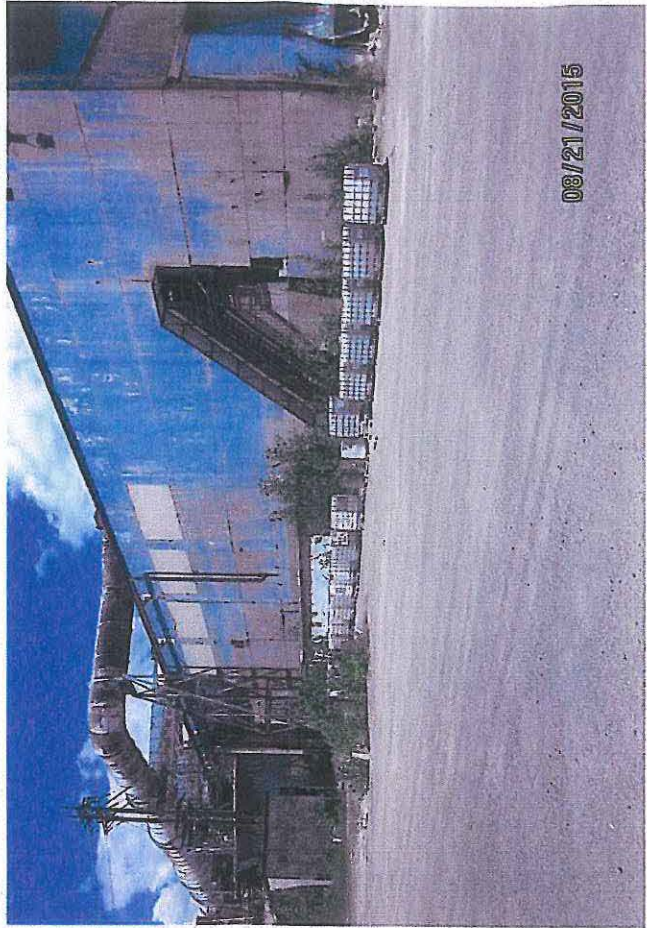
03/21/2015

6942



03/21/2015

6939

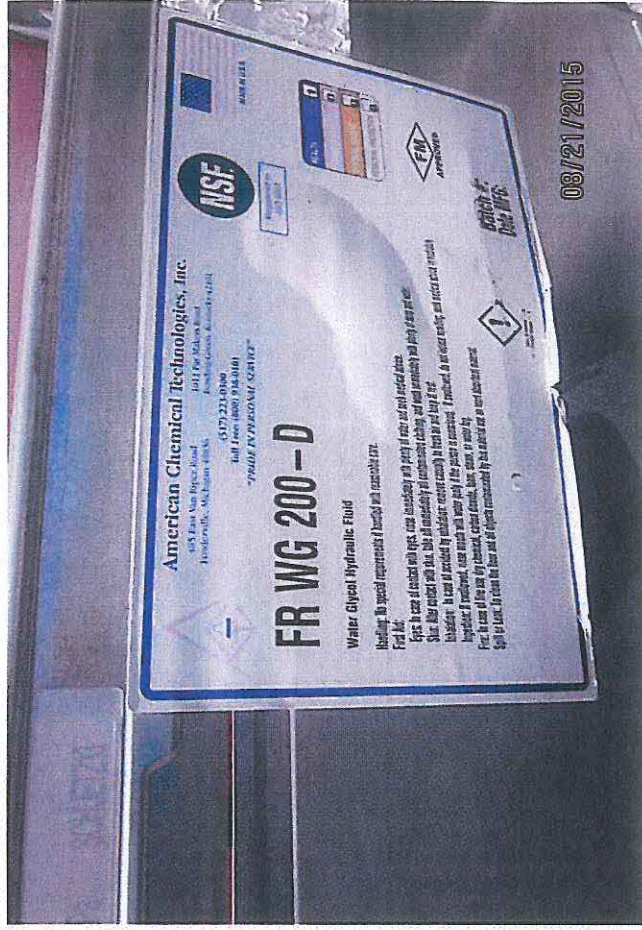


03/21/2015

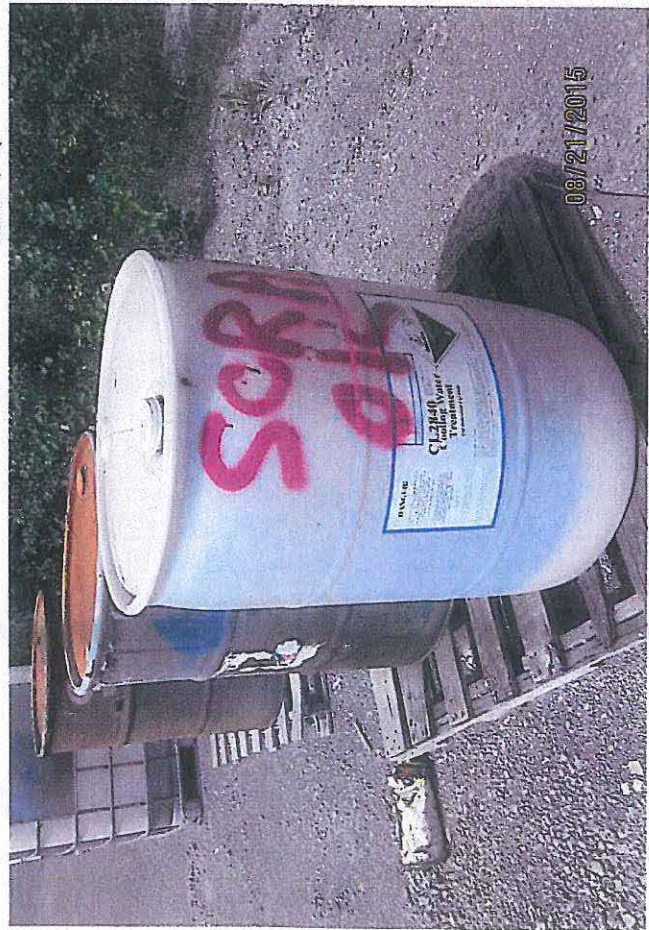
6941



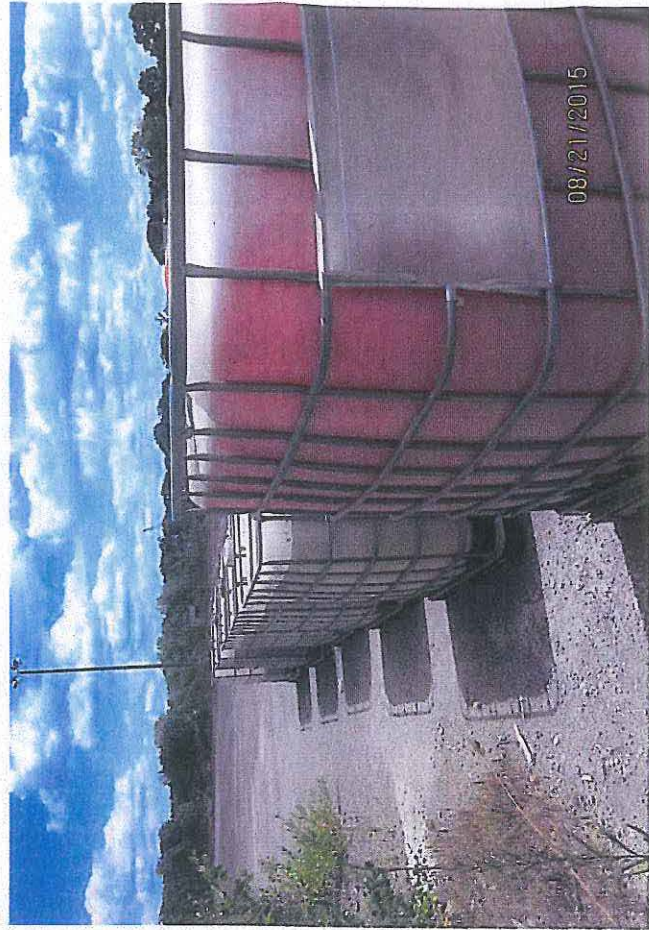
6944



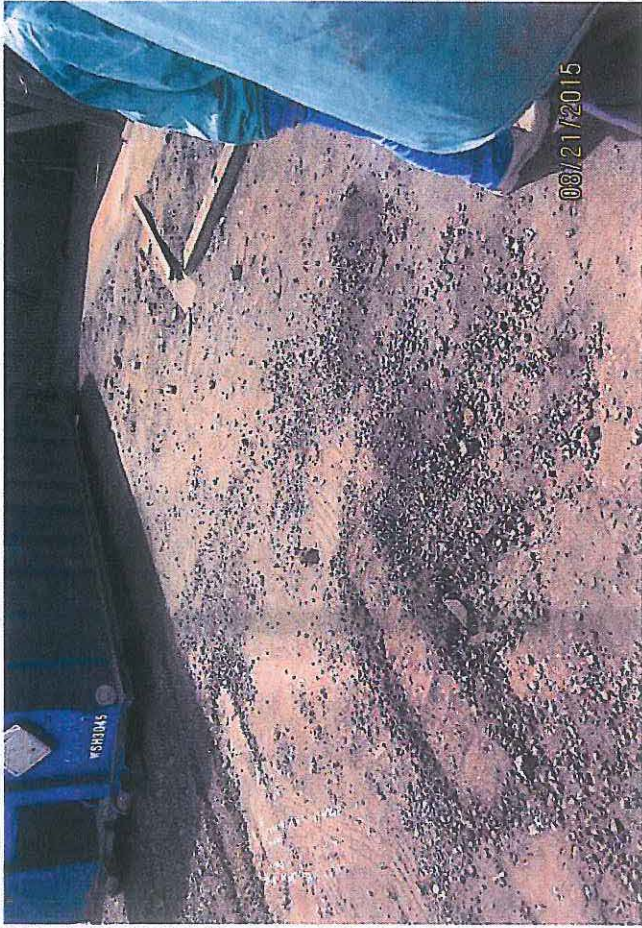
6946



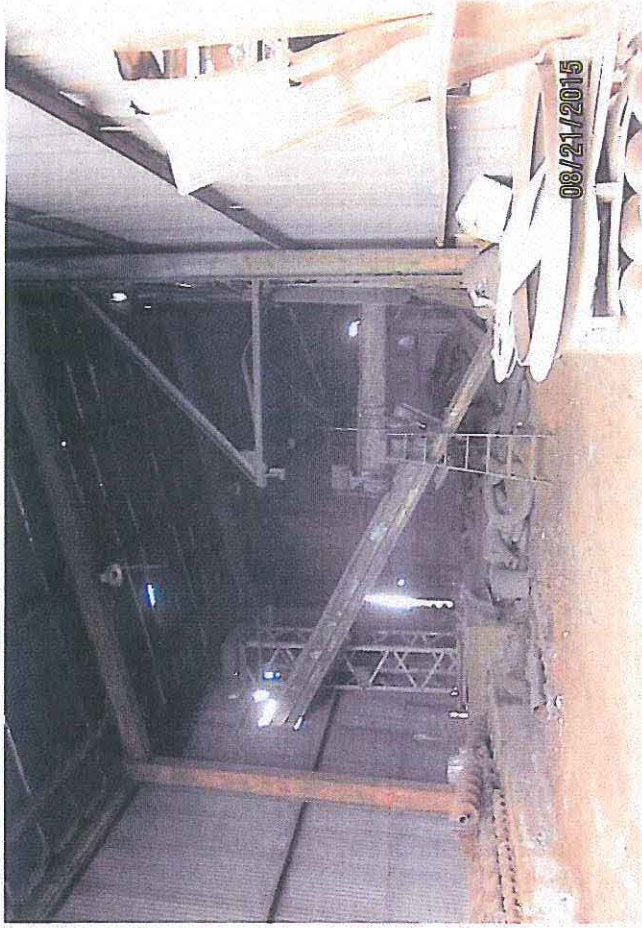
6943



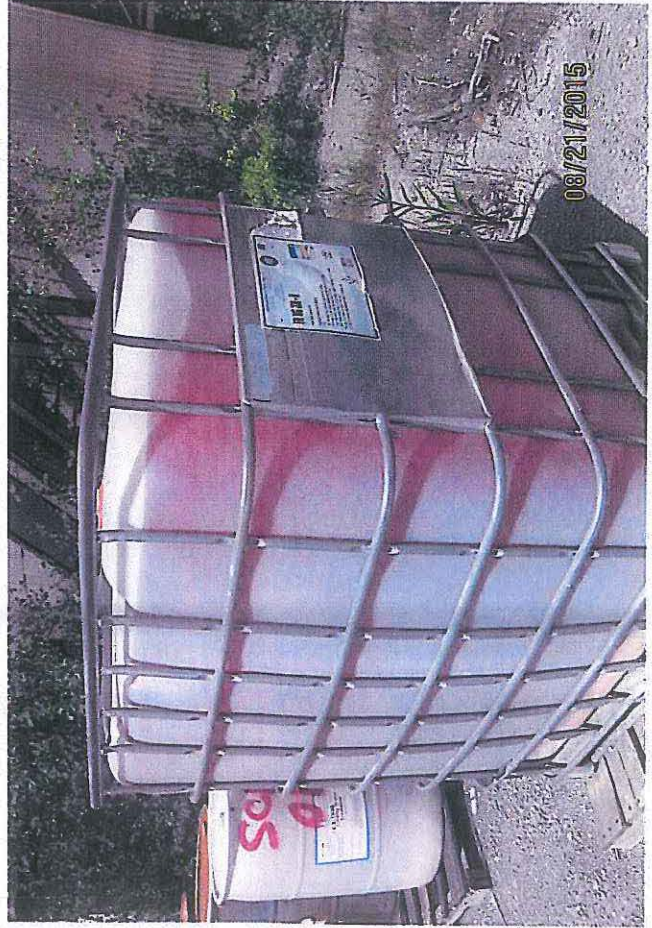
6945



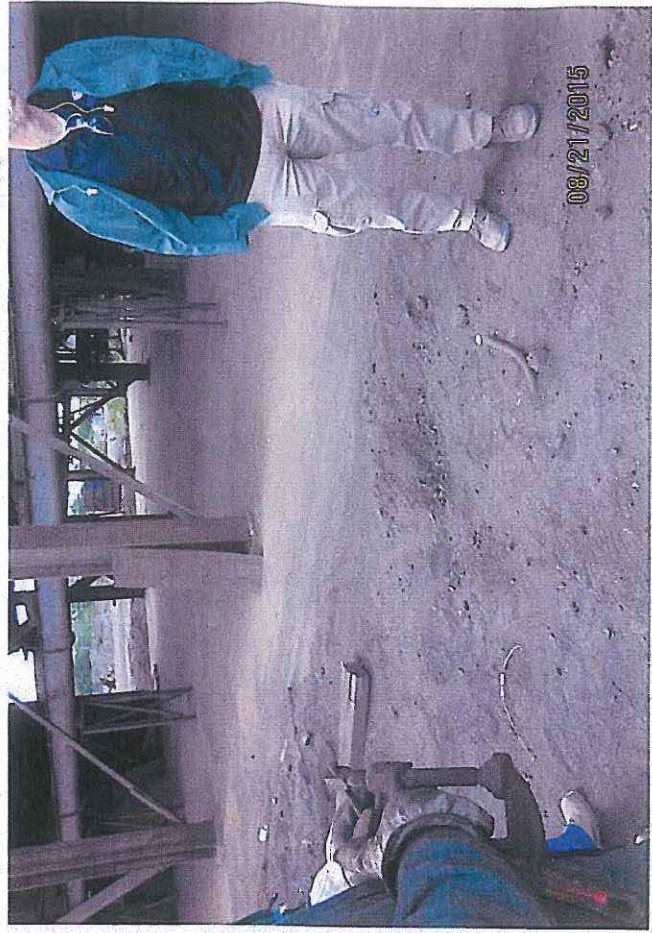
6948



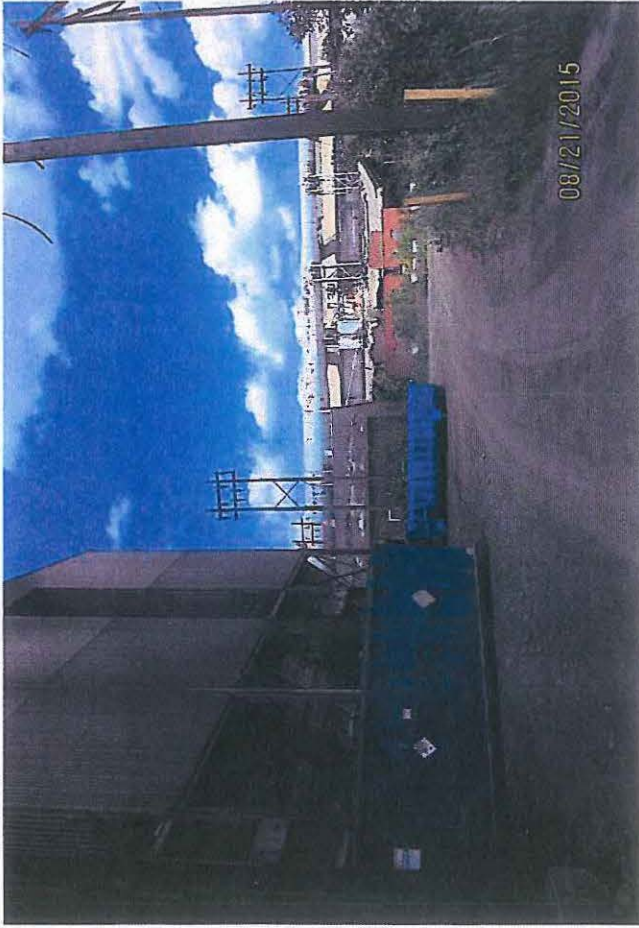
6950



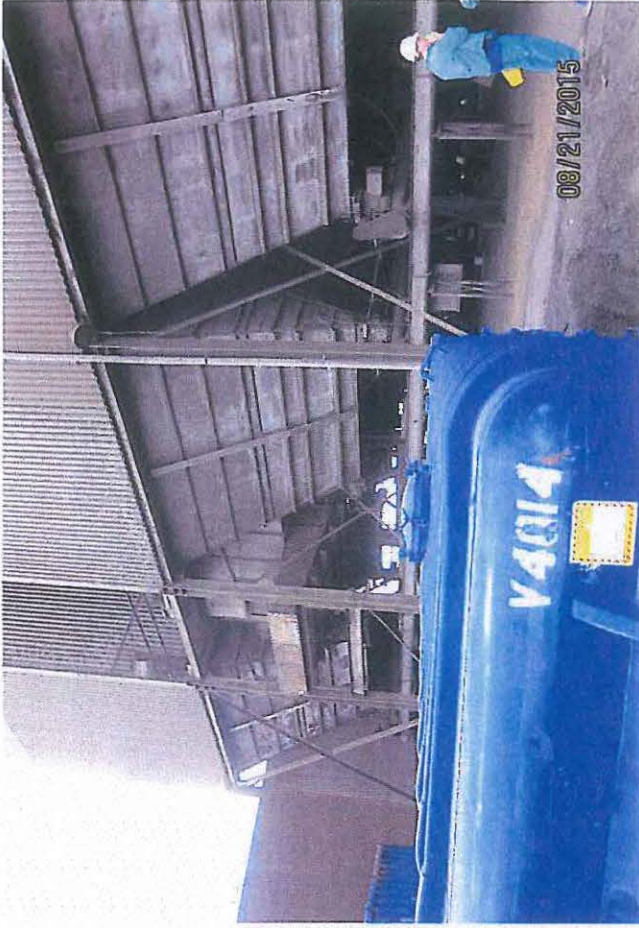
6947



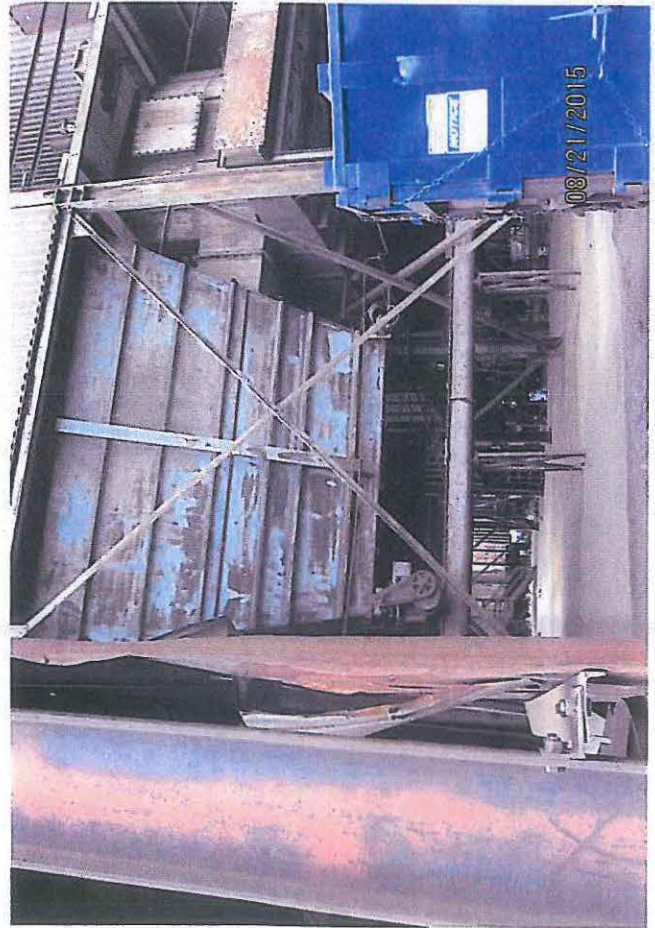
6949



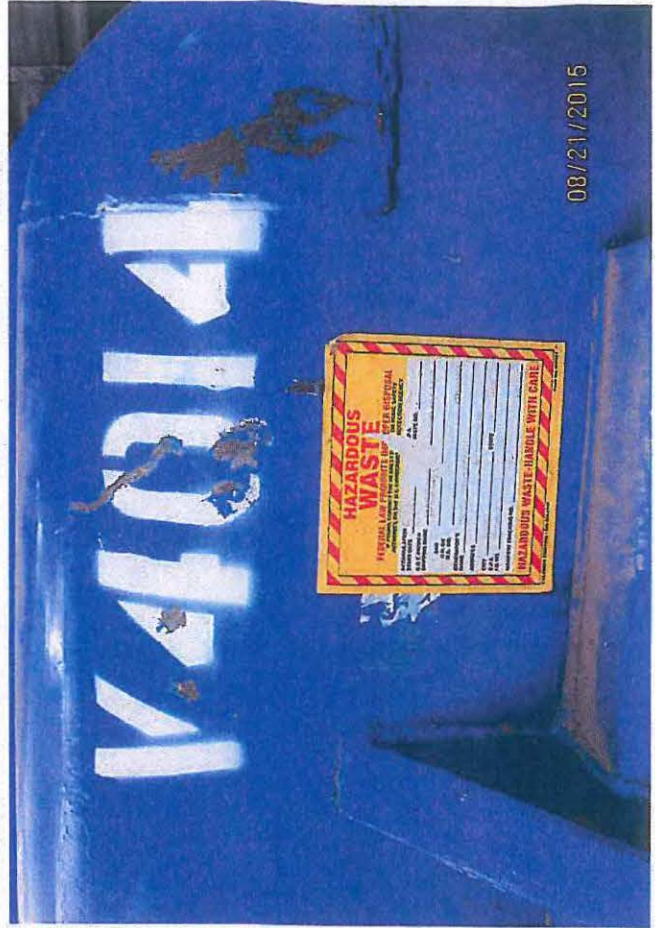
6952



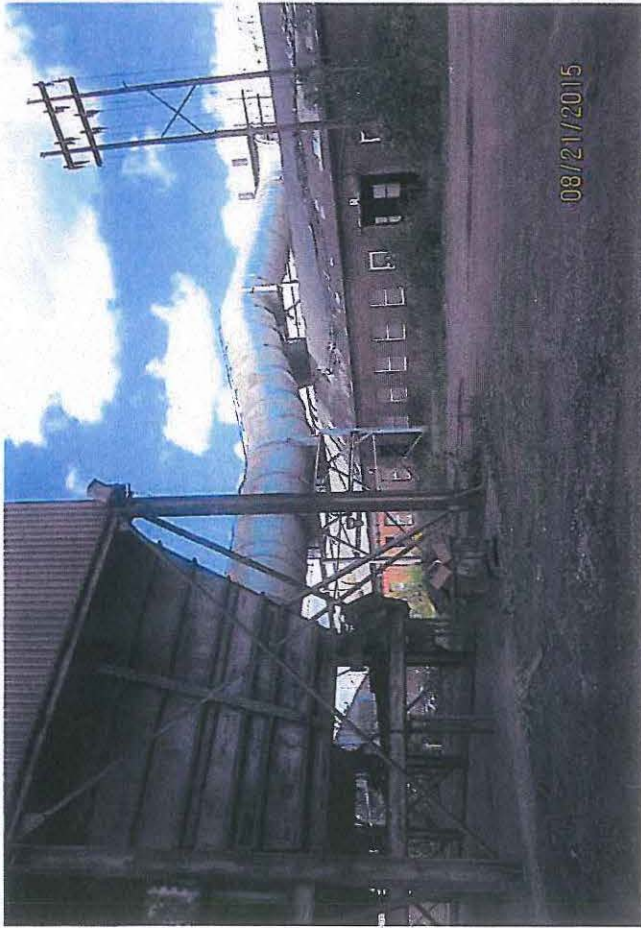
6954



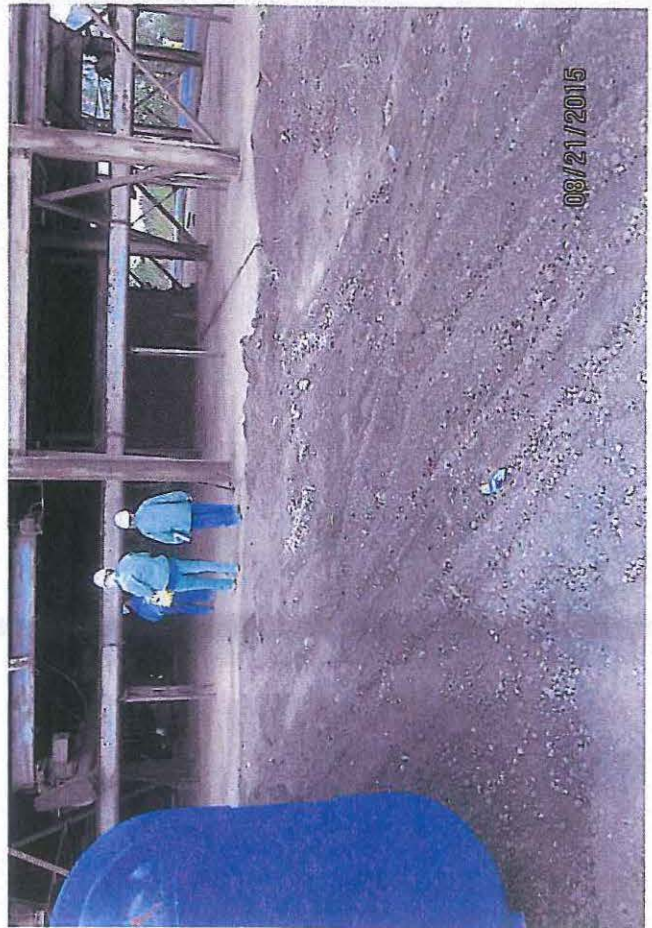
6951



6953



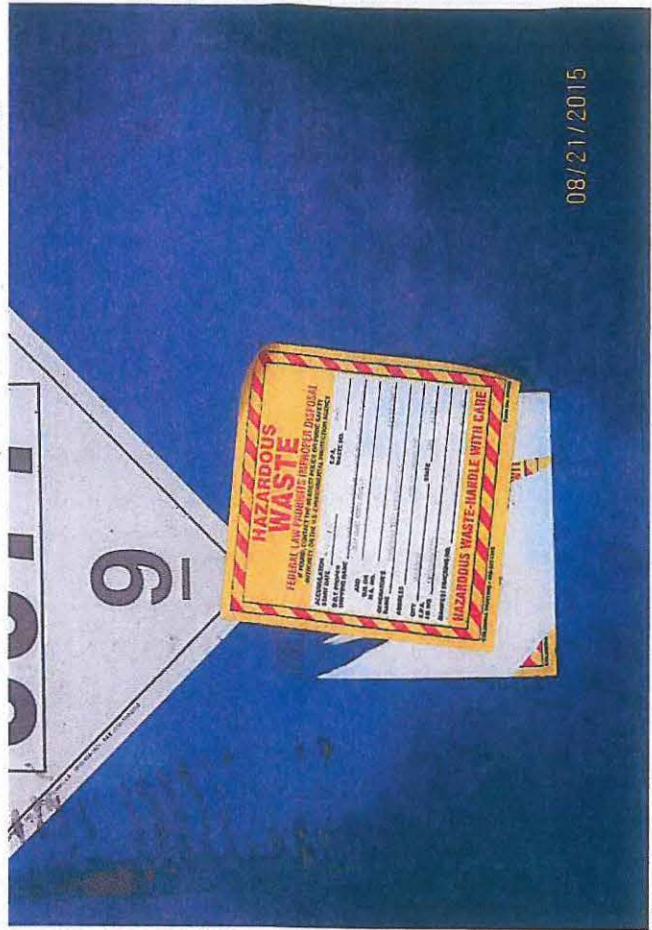
6956



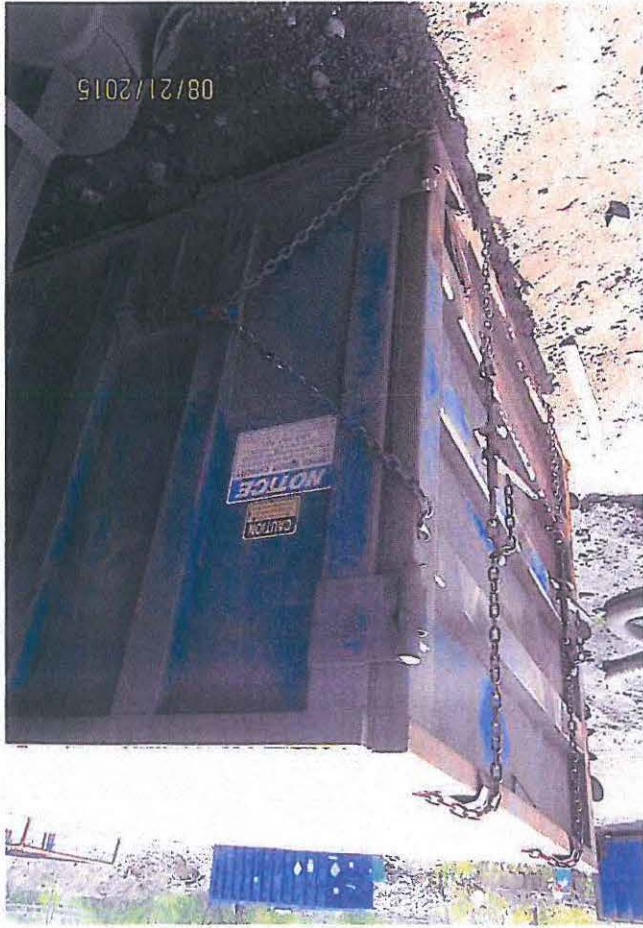
6955



6958



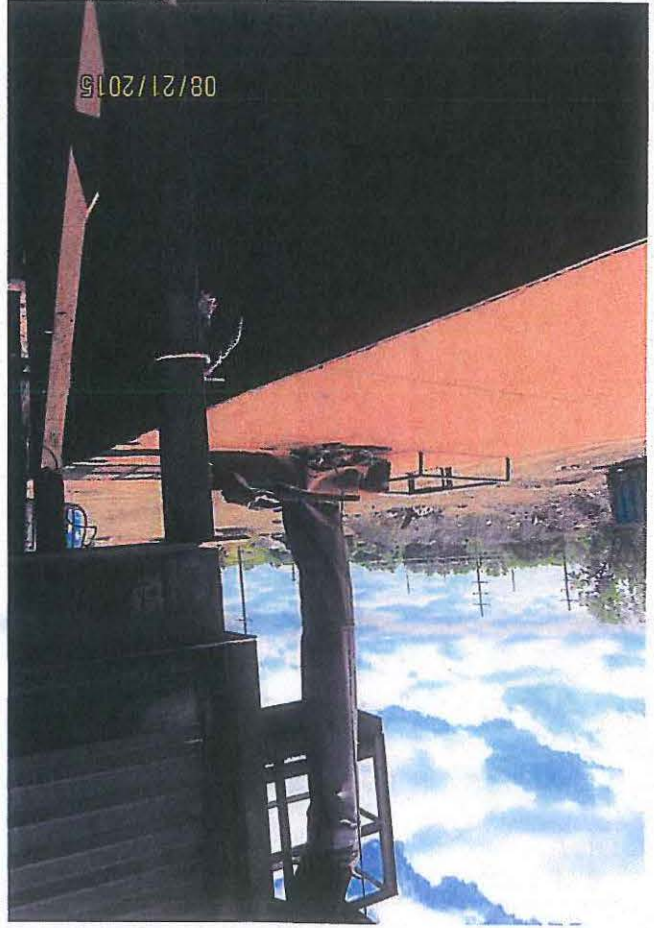
6957



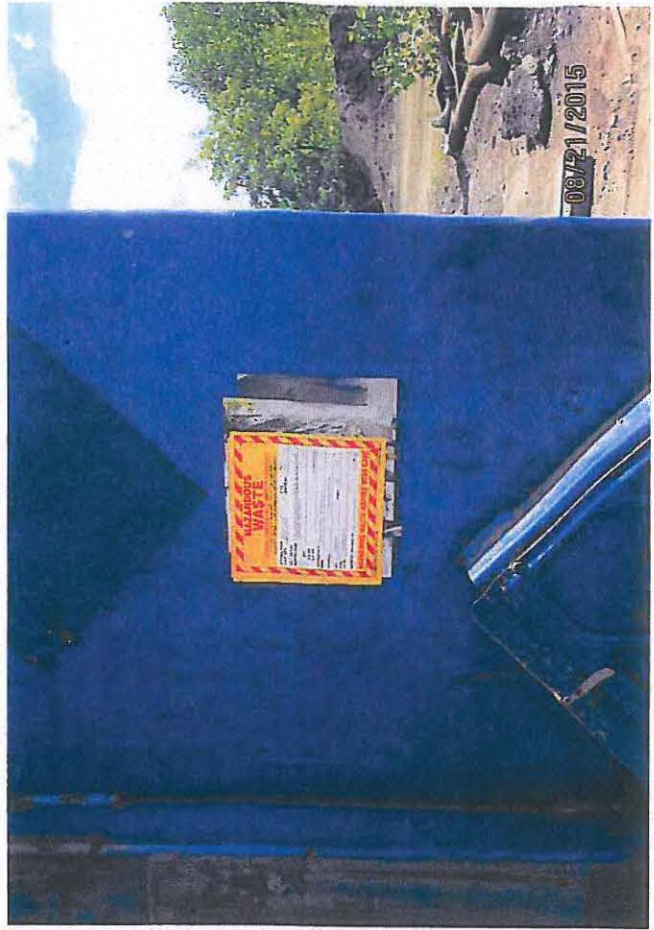
6960



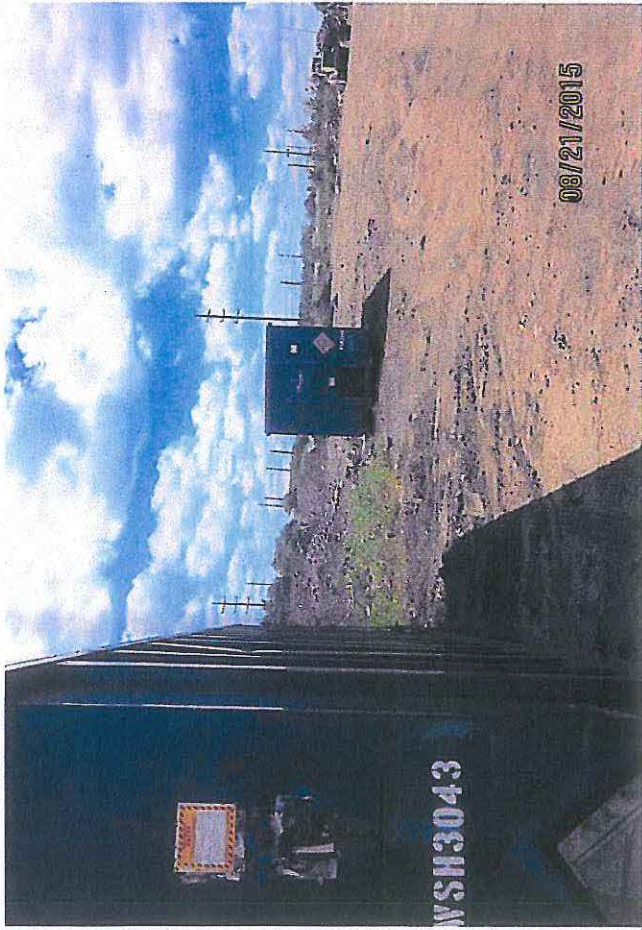
6962



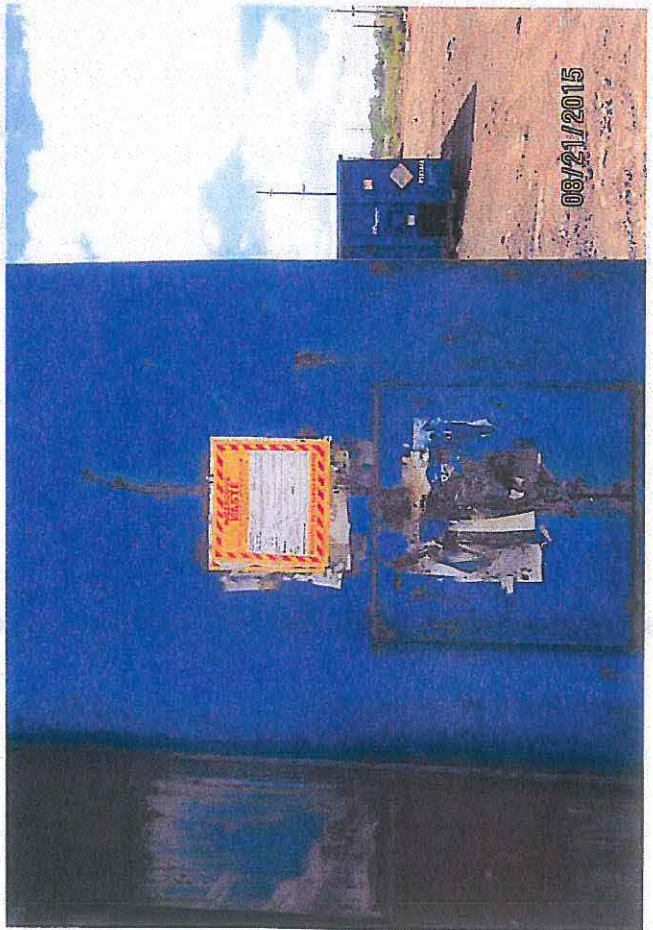
6958



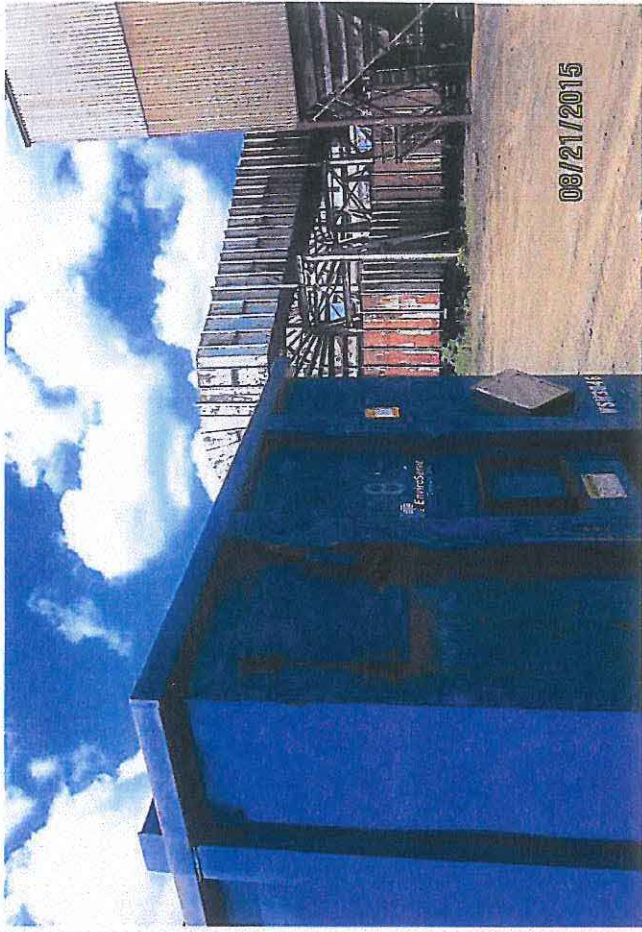
6961



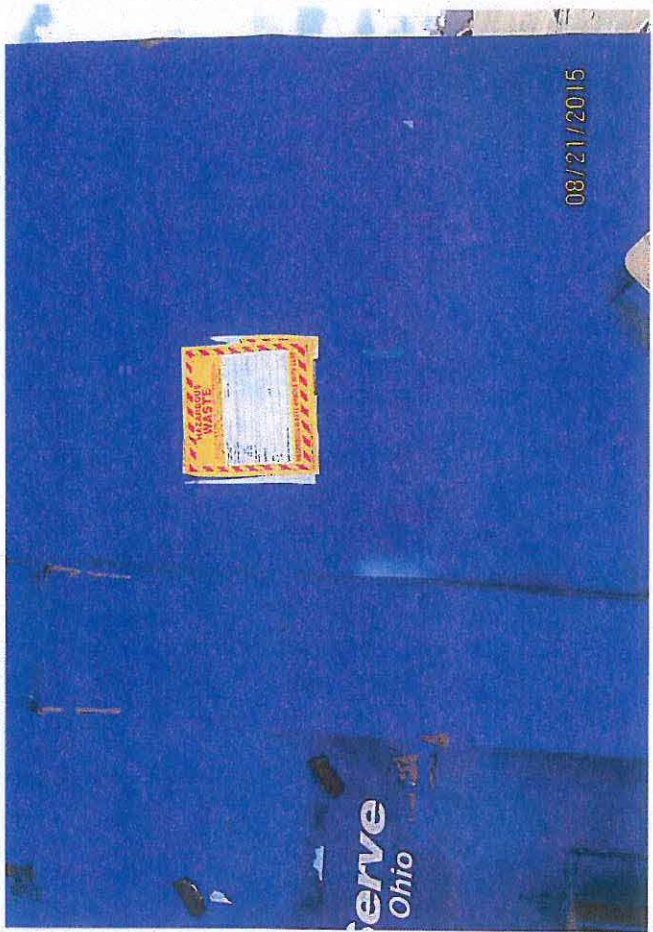
6964



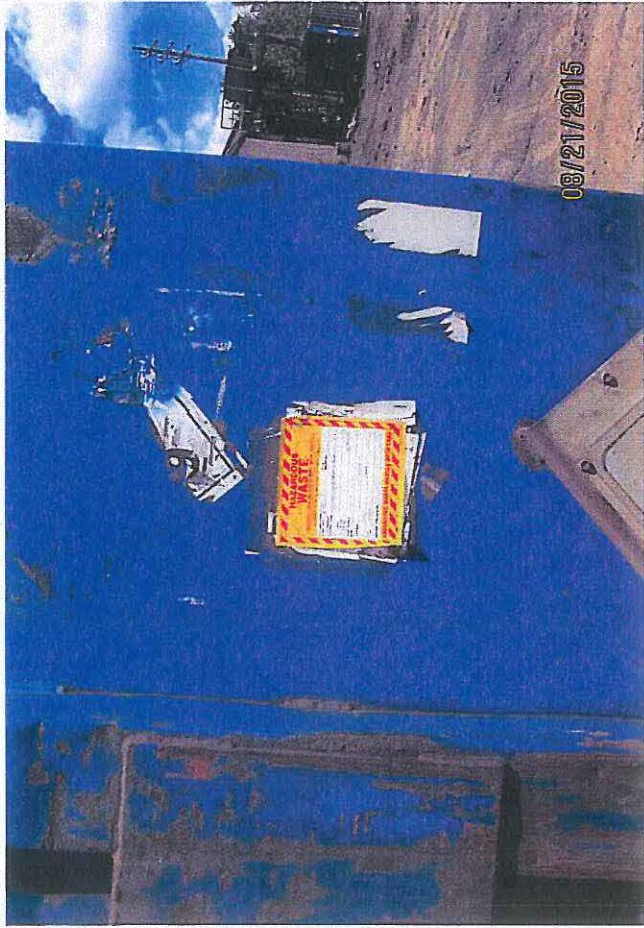
6963



6966

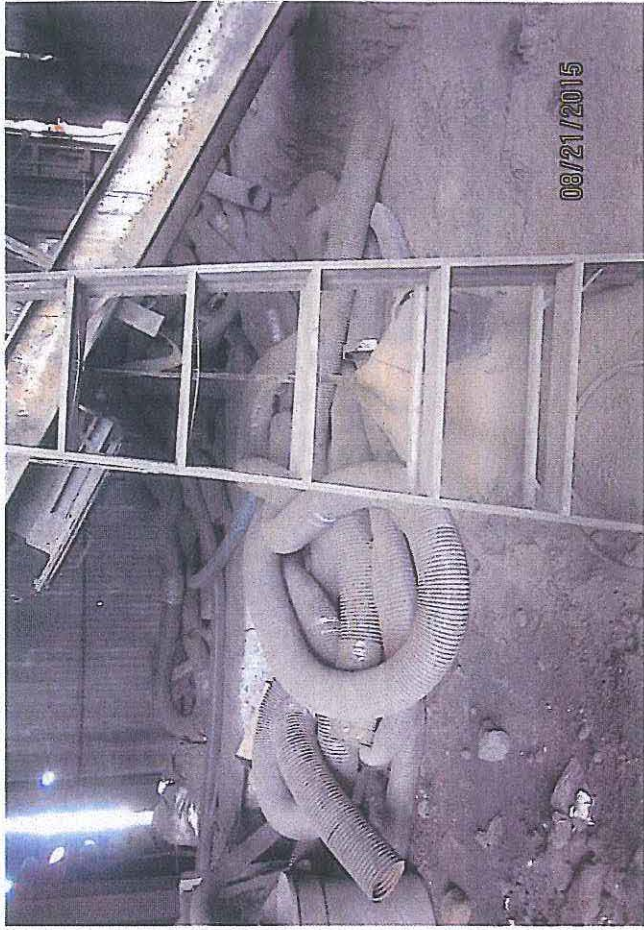


6965



08/21/2015

6968



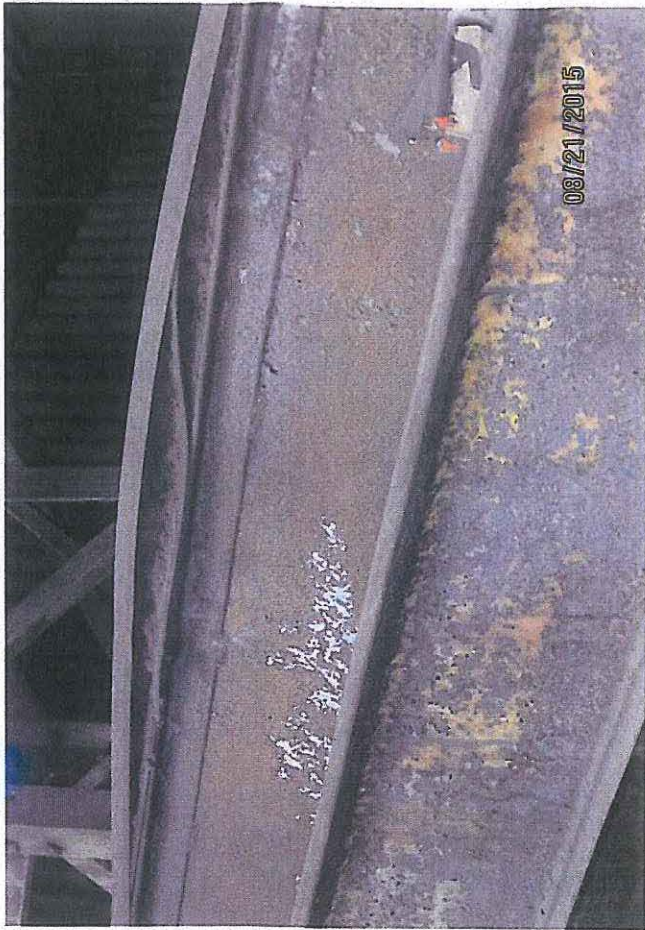
08/21/2015

6970



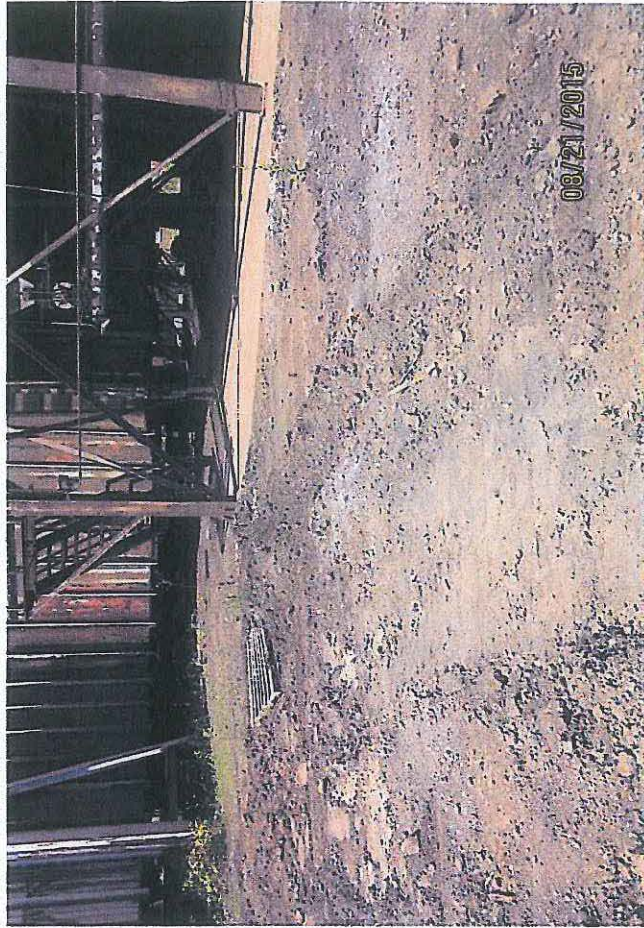
08/21/2015

6967



08/21/2015

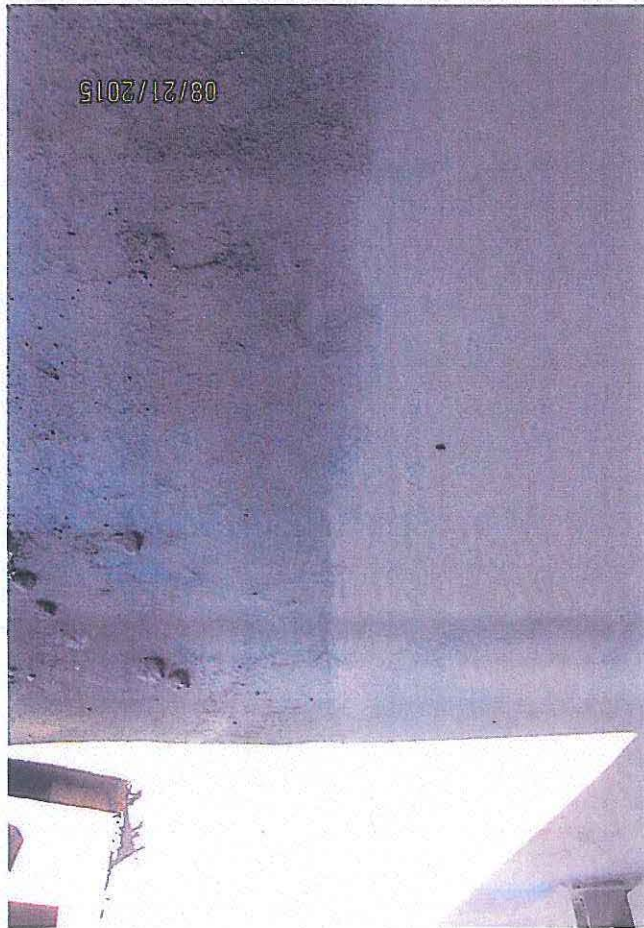
6969



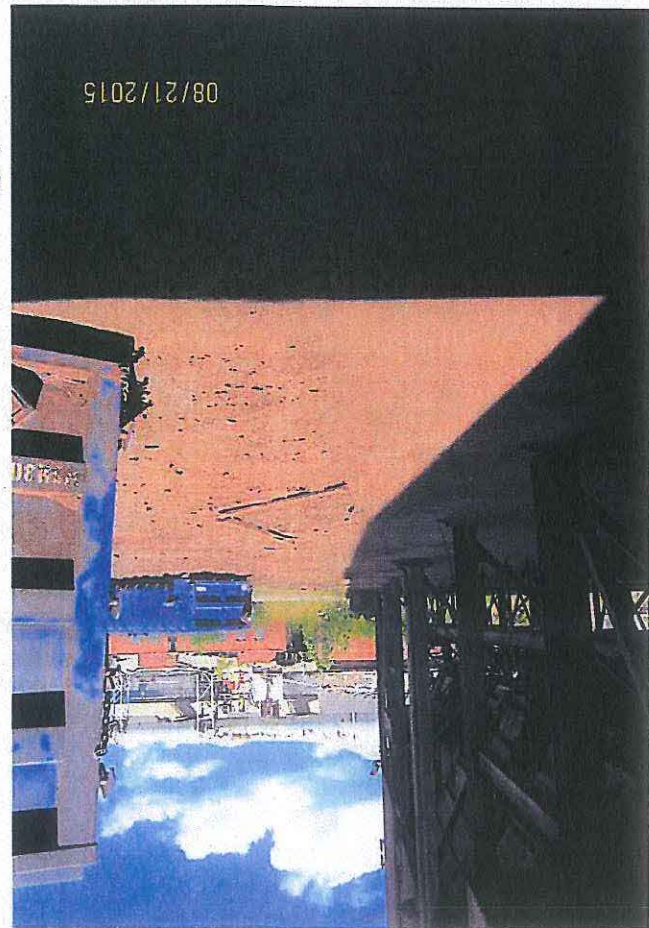
6974



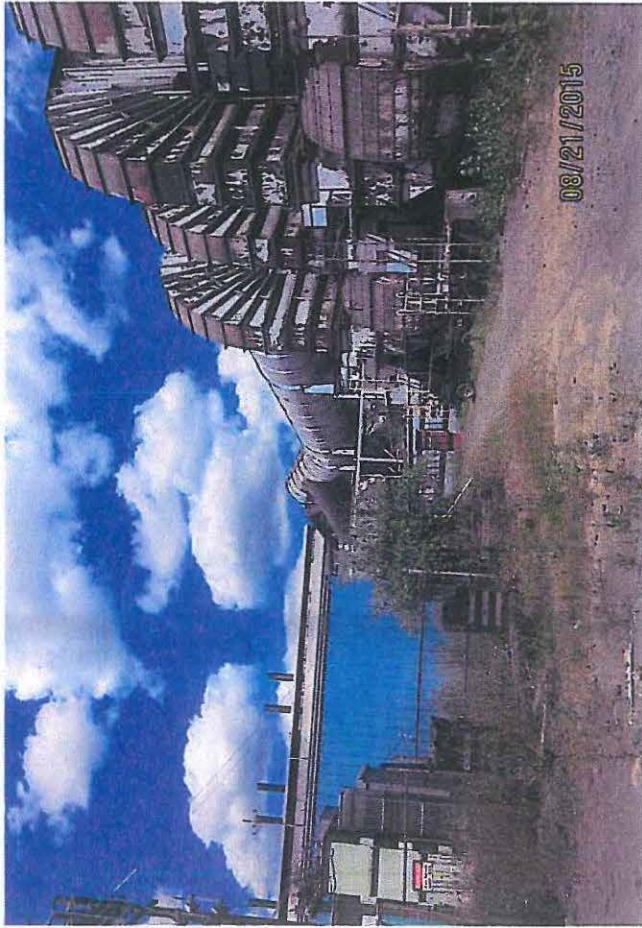
6973



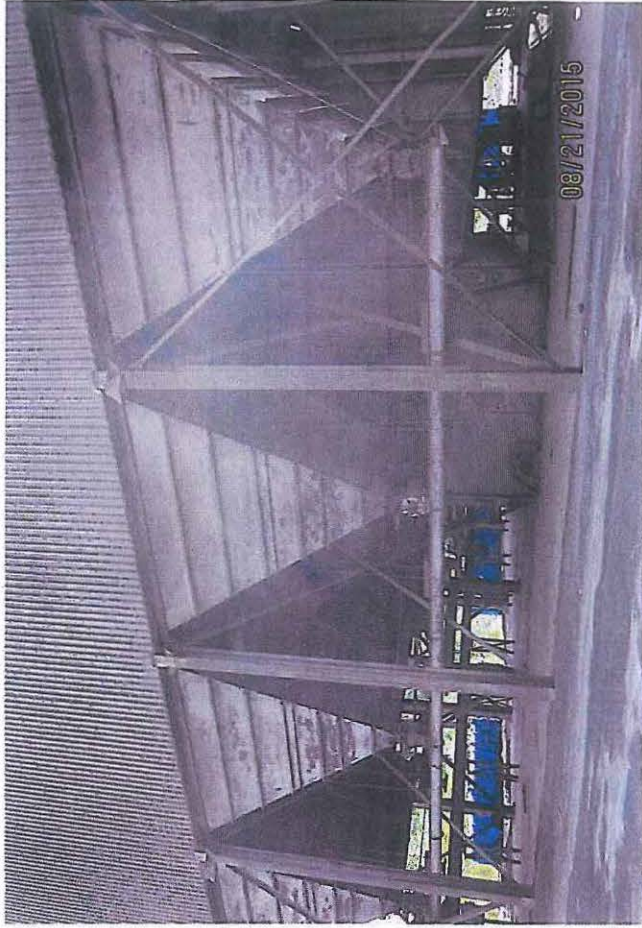
6972



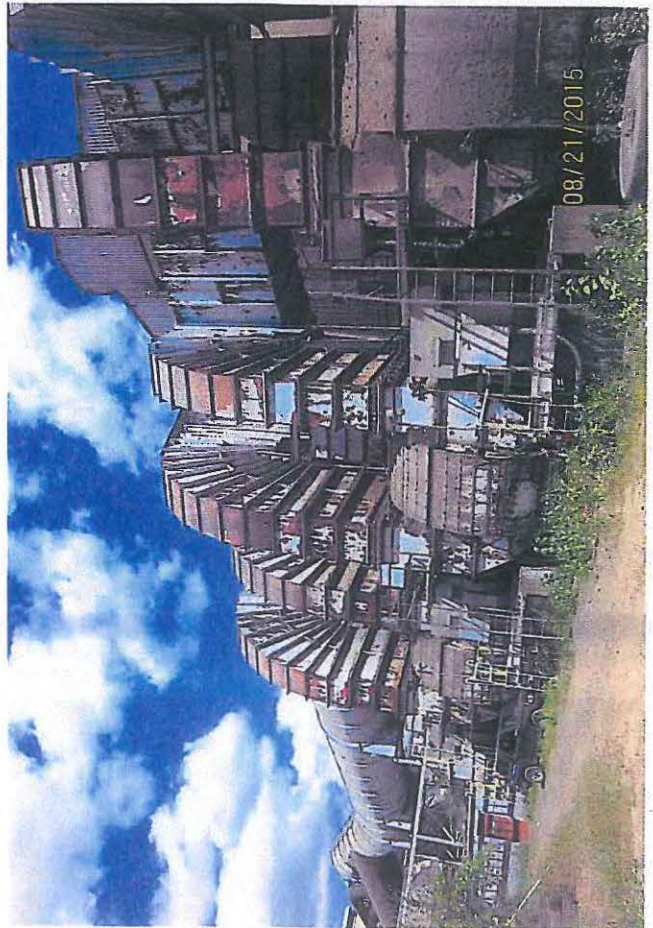
6971



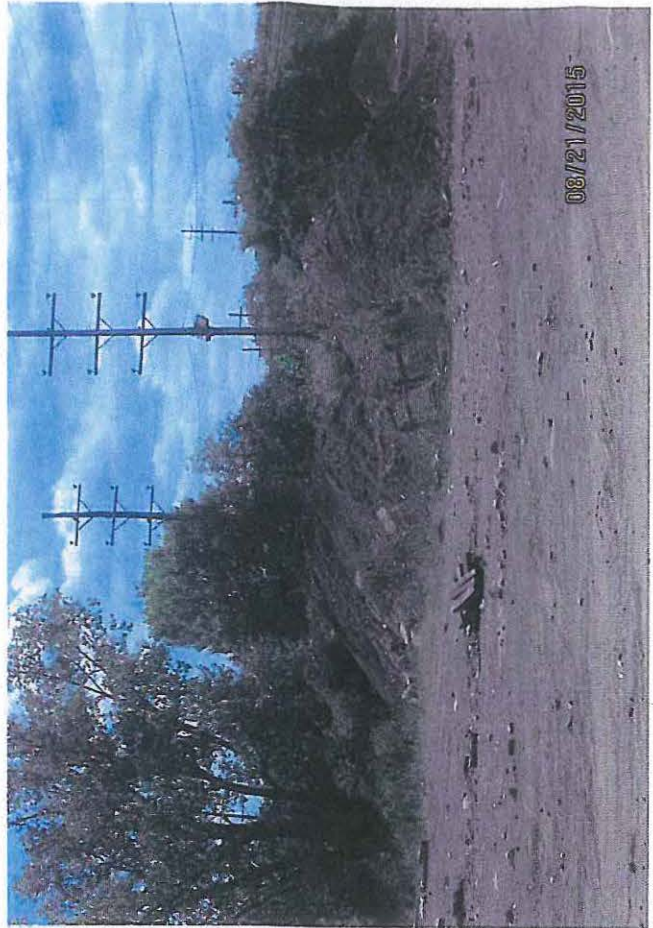
6976



6978



6975



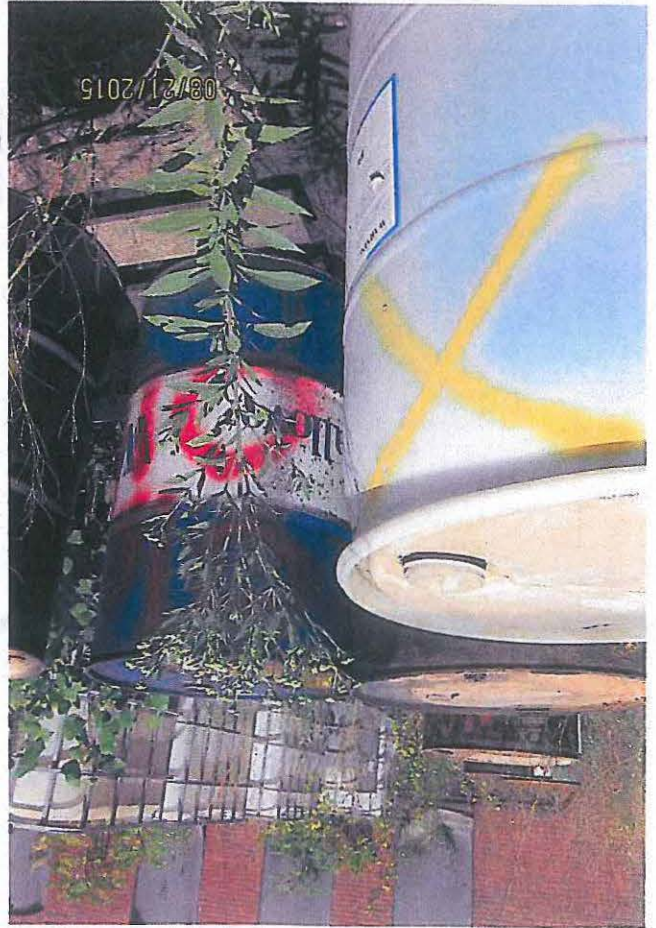
6977



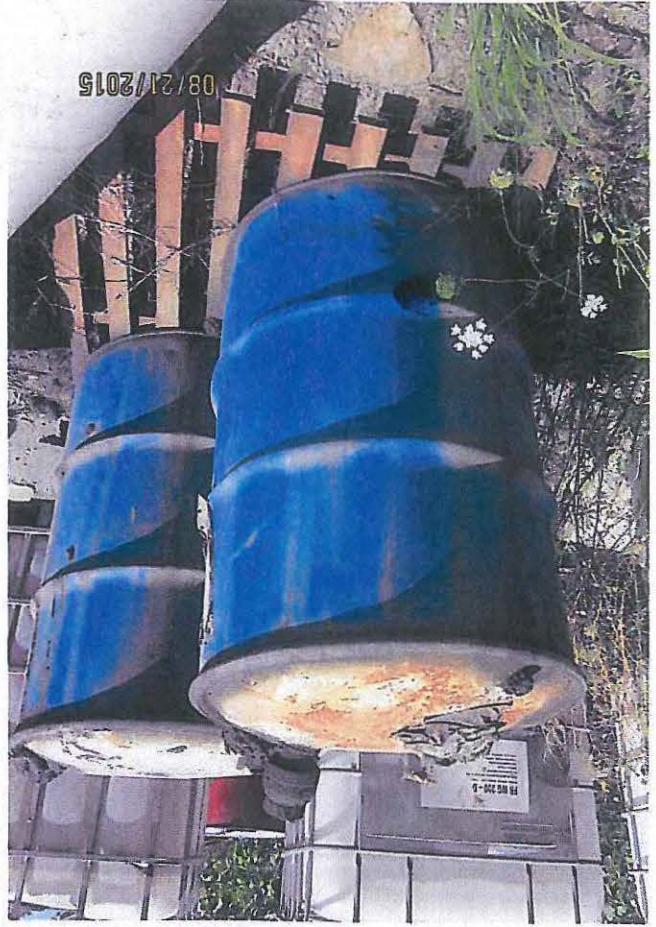
6980



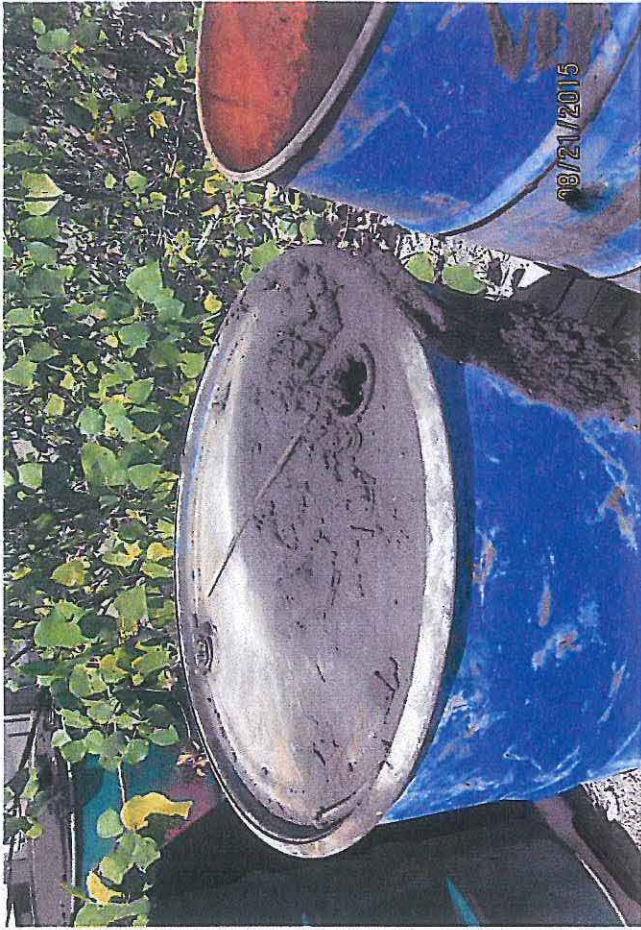
6982



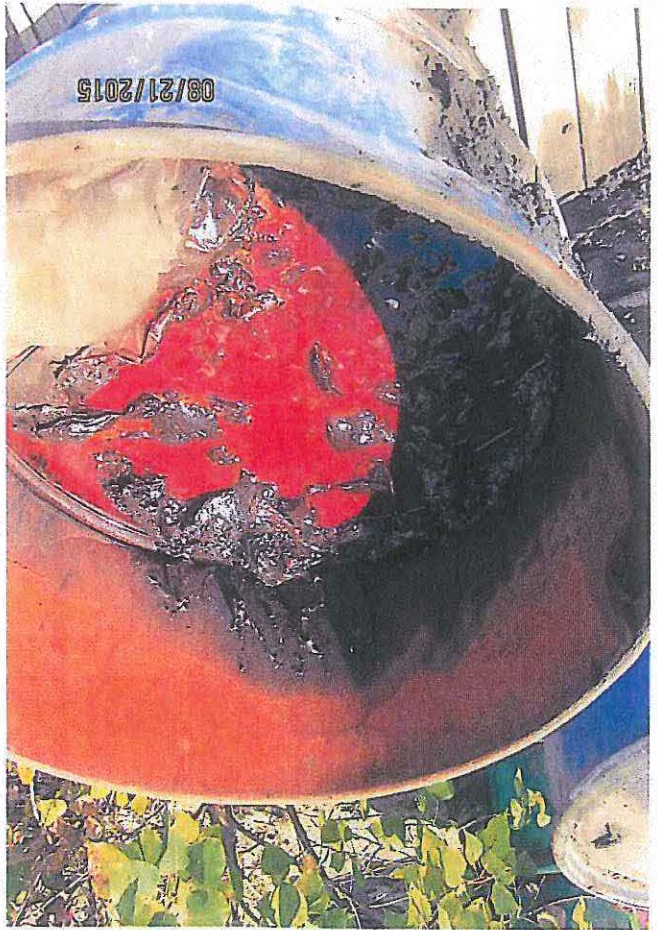
6979



6981



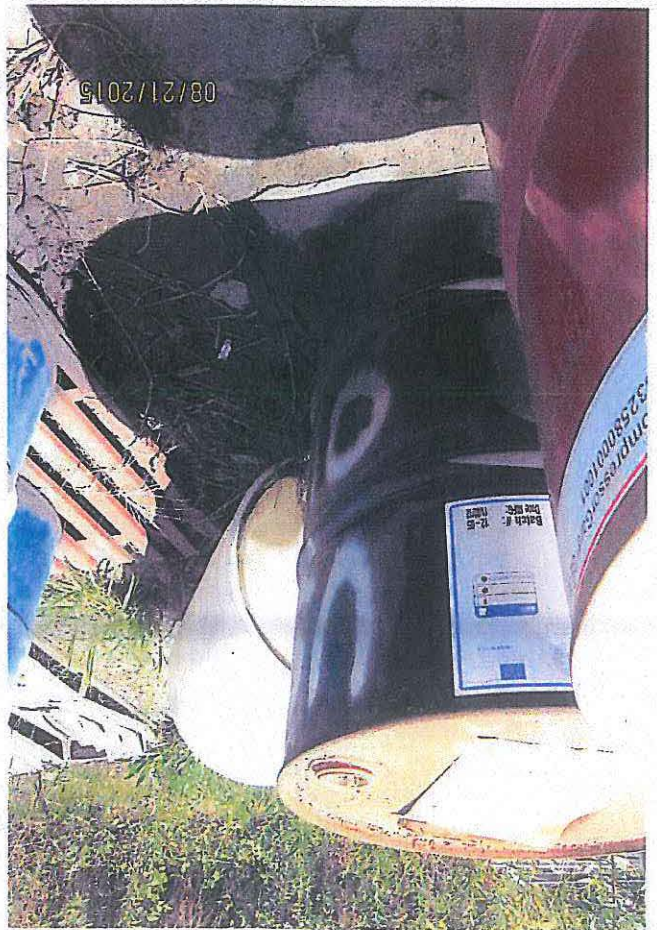
6986



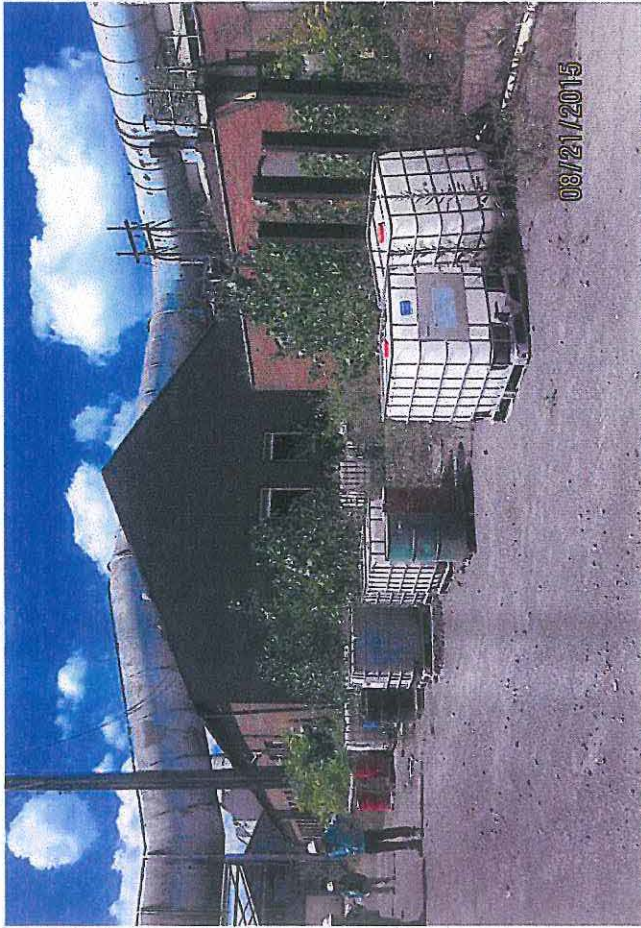
6985



6984



6983



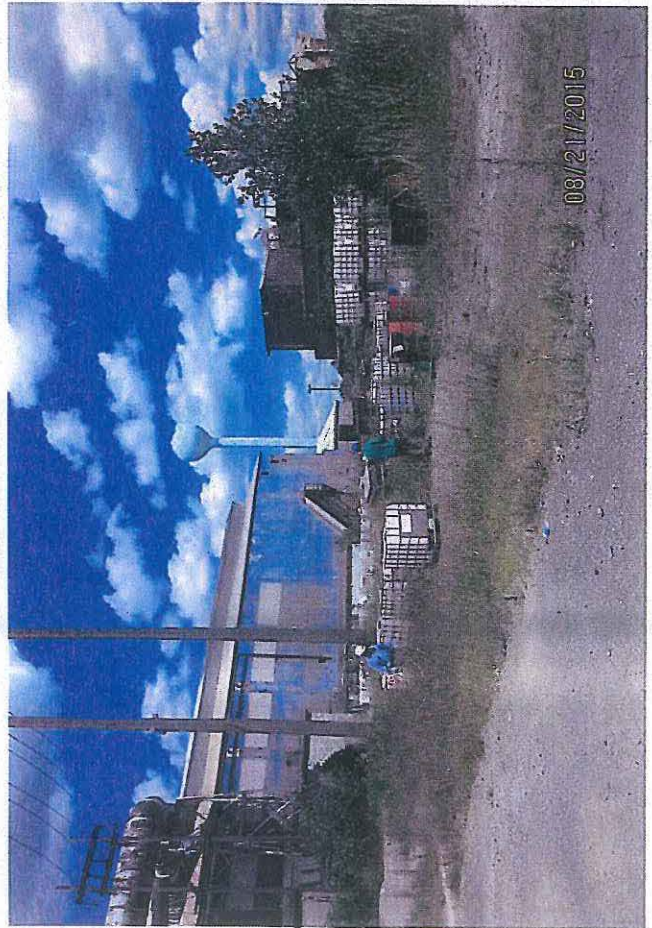
08/21/2015

6988



08/21/2015

6990



08/21/2015

6987



08/21/2015

6989